

3 December 2021

Emailed to: info@eirgrid.com

RE: TSO PR5 RES-E Multi-Year Plan 2022-2026

Wind Energy Ireland (WEI) welcomes the opportunity to engage with EirGrid and provide feedback on the TSO PR5 RES-E Multi-Year Plan 2022-2026.

WEI is the nation's largest renewable energy organisation with more than 150 members who have come together to plan, build, operate, and support the development of the country's chief renewable energy resource. We work to promote wind energy as an essential, economical, and environmentally friendly part of the country's low-carbon energy future.

We would like to make the following comments in relation to the consultation:

In general, we would like to emphasise the importance that the workstreams in this plan must be considered in the context of the updated national policy target of 80% RES-E by 2030. This is likely to require re-consideration of the PR5 annual targets which may no longer be appropriate and will not put us on the right path to delivering 80% RES-E by 2030.

SNSP Increase

We are supportive of the incentive to increase the SNSP level to 85% by 2025. The CRU incentive does contain interim steps to deliver this such as reaching 80% SNSP by 2023 but this does not appear to be addressed in the TSO's plan. More detail would be useful on how the TSO intends to deliver these changes and this is related to the Operational Policy Roadmap which we have commented on below.

Operational Policy Roadmap to 2030

As was the case with the original DS3 programme which targeted 2020 and 75% SNSP, there should be a clear plan of how the SNSP limit will be increased in steps up to 100% in 2030 and this should be regularly updated and communicated to industry. We welcome the development of this

plan and hope to be able to engage on the development and outputs of this and build on what has worked well so far in the DS3 programme.

As part of this workstream a study to understand how much an increased SNSP limit is expected to reduce curtailment and the interaction with the other system constraints like minimum conventional generation levels would be useful to determine which work areas have the biggest impact on RES-E.

Further to this, a key operational metric is the total capacity of minimum level of conventional synchronous generation on the grid during times of dispatch down as opposed to just the minimum number of sets required. The required minimum generation MW capacity and technically possible minimum generation MW capacity should be clearly tracked in a uniform time series manor in the same way as SNSP is calculated for every half hour or hour. This would be a good means of monitoring and improving operation of minimum generation over time.

We would also note that flexibility, grid forming services and system restoration do not seem to have a short-term focus in this plan, however they impact the type of generators and converters connecting. It is harder to retrofit and receive these services especially in offshore, so it will be important that the roadmap also focusses on developing and incentivising these capabilities.

Nodal Controller

The nodal controller trial has been ongoing for many years now and the timeline for the completion of the trial without any further steps on further roll out is concerning. We would suggest that there is a cost benefit analysis carried out, including the cost to renewable generators, of the retrofitting of nodal controllers into windfarm projects and more detail on next steps and timelines to rollout these opportunities to more renewable generators on the distribution system.

Reduce Minimum Number of Large Synchronous Units and Inertia Floor

We fully support the workstream to reduce the minimum number of synchronous units and the inertia floor. However, the steps to do this are extremely cautious considering that many of the steps and studies needed to reduce inertia and min units should already be complete or are in the process of being completed via the existing DS3 programme. It is not apparent that any of the benefits will be seen from the RoCoF trial and 75% SNSP trial that are underway until this inertia

floor is also reduced. There are interactions here that would have an impact on RES-E that need to be considered.

The success criteria does not seem to link with the outputs listed as it is not mentioned how or when other sources of inertia will be brought on the system. The SEM Committee has issued a direction to assess procurement options for low carbon inertia sources and the rollout of these tenders should be included in this plan as the timeframes for the development of this process should be well within this price review period.

Greenlink Operating Procedures:

We support the development of additional interconnection but emphasize the need to ensure the right operating policy is in place to allow the interconnectors to operate efficiently and provide maximum benefit in terms of RES-E. From our analysis, the Moyle interconnector is observed to be predominantly importing during times of constraints in Northern Ireland. It is recommended a study is carried out to demonstrate how the additional IC capacity will impact on dispatch down during periods of local constraints and system wide curtailment for both import and export scenarios based on market modelling.

Celtic Operating Procedures

The above proposed study should also be complete to determine any negative impact of the Celtic interconnector on constraints in the South-West region.

Enhanced Reporting on renewables:

This is a welcome workstream, but it should be consulted on with industry on the exact methodologies and data sets being proposed. From reading this consultation document it appears that the TSO has already decided on a “company wide data strategy” approach. Our suggestion is for the TSO to engage with industry on these reporting measures and work collaboratively on this initiative.

Detailed Studies and Analysis to Support Progress towards the 2030 Targets

This is also a welcomed workstream but we would suggest it starts with a detailed study on the impact of the current and historical renewable integration limiting factors on dispatch down levels. This includes reviewing the operation of SNSP, minimum conventional generation levels,



interconnector operation and demand side management during constraint and curtailment events.

Performance Assessment for 2022

We do not agree with splitting up the incentive equally across each of the ten initiatives as some of them will A) have a much larger impact than others and B) will be easier to achieve than others. It is suggested that more weight should be given to the incentives that will have a greater impact on reducing dispatch down such as reducing current operational constraints.

Conclusion

We thank EirGrid for offering us the opportunity to provide feedback on TSO PR5 RES-E Multi-Year Plan 2022-2026. We are available to discuss any of these points at your convenience and we look forward to further engagement.

Yours sincerely

A handwritten signature in black ink, appearing to read "Bobby Smith", is written over a thin horizontal line.

Bobby Smith
Senior Policy Advisor
Wind Energy Ireland