

DRAFT

## MINUTES OF THE SONI GRID CODE REVIEW PANEL MEETING

Held at SONI offices, Castlereagh House, Belfast

On 8 June 2011 at 10:30

Present:

| <b>Members/Alternates</b> | <b>Representing</b>           |   |
|---------------------------|-------------------------------|---|
| Dick Lewis                | SONI                          | Chairman                                  |
| Adrian Henning            | SONI                          | As an observer for SONI                   |
| Bronagh McKeown           | SONI                          | As an observer for SONI                   |
| Conor O'Doherty           | SONI                          | As an advisor for SONI                    |
| Tom McCartan              | SONI                          | (Alternative for Alex Baird)              |
| Angela Blair              | NIE Energy PPB                | Observer                                  |
| David MaCartney           | NIE Energy PPB                | Observer                                  |
| Jim Cooke                 | Coolkeeragh ESB Power Station | Generator                                 |
| Ivan Purvis               | AES Ballylumford              | Generator (Alternative for Denis McBride) |
| Brian Mongan              | AES Kilroot                   | Generator (Alternative for Ian Luney)     |
| Cathal Martin             | SSE Renewables                | Generator                                 |
| Billy Walker              | NIAUR                         | Regulator                                 |
| Juliet Corbett            | NIAUR                         | Regulator                                 |
| Ewan Powrie               | Secretary of the GCRP         |   |

### 1. Chairman's Introduction to the Meeting

- The Chairman welcomed the Panel Members and gave an overview of the agenda.

### 2. Apologies for absence

- The Chairman noted that apologies had been received from Brendan Woods (SONI), Alex Baird (SONI), Alan Kennedy (SONI), Gerry Hodgkinson (NIE), Mick McGuckin (Mutual Energy) and Denis McBride (AES Ballylumford).

### 3. Minutes of the Grid Code Review Panel Meeting held on 23<sup>rd</sup> February 2011

- The Chairman informed the group that comments had been received on the previous meeting's draft minutes from Joe Duddy (SSE Renewables), and took the opportunity to respond to some of the points raised.

- The Chairman noted that the Panel is increasingly representative of the industry as a whole, and SONI would like to encourage Panel Members to share any minutes with their colleagues in order to keep them fully informed of activities and developments.
- Certain items from the previous GCRP minutes were addressed specifically, namely:
  - Update on approval of Fail to Sync and Fail to reach Min Gen proposed changes (Item 5): these changes are now in place in the latest version of the Grid Code.
  - Review of OC11 (item 6): it was noted that this item would be discussed later on in the meeting (see item 5.1 below).
  - Technical Parameters (item 7): it was noted that this item would be discussed later on in the meeting (see item 8 below).
  - Constraints (item 8): Tom McCartan, in response to the issue raised by Ian Luney in the last GCRP meeting, informed the Panel Members that SONI is currently providing the same information as EirGrid as a monthly report on rolling availability, which is published on the internet.
  - Minor updates to Grid Code (item 9): it was noted that this item would be discussed later on in the meeting (see item 5.1 below).
  - Any other business (item 10):
    - Moyle Interconnector: the Chairman provided the Panel with a summary of recent updates. Firstly, SONI and National Grid have developed methodology statements for the capacity calculations for the Moyle interconnector. Secondly, Ofgem and NIAUR have taken the decision that Moyle should publish such statements, rather than SONI or National Grid; the regulators are currently taking this forward and seeking relevant approvals (for example, from DECC and DETI). Lastly, the Chairman confirmed that the summer/winter import capability of Moyle is 450MW/410MW, and that there is currently 287MW export capacity. Auctions have been taking place for this export capacity since February 2011, but there has been little movement.
    - Dwell Time: it was noted that this item would be discussed later on in the meeting (see item 5.2 below).
    - Ramping rates of WFPS: it was noted that this item would be discussed later on in the meeting (see item 6.2 below).
    - Wind farms: SONI Guidance Notes: it was noted that this item would be discussed later on in the meeting (see item 7 below).
    - Fuel Security Code: Tom McCartan informed the Panel that this issue is currently with DETI's lawyers. Juliet Corbett confirmed that a final version is expected by NIAUR soon, and that NIAUR would circulate a note to interested parties, as discussed previously with NIE PPB. Whether or not the Grid Code will need to be

amended is still to be confirmed, although operational procedures will need to be drafted.

#### 4. Points arising from Minutes (not otherwise included in Agenda)

- There were no other points arising from the minutes.

#### 5. Grid Code Changes

##### 5.1 Update on approval of OC11 changes, Agreed Testing and Monitoring Procedures No. 1 and Minor Admin Amendments

- All of these items are currently with NIAUR and awaiting final approval. Juliet Corbett confirmed that NIAUR will be approving these shortly.

##### 5.2 Dwell Time consultation

- The Chairman confirmed that, following the close of the consultation on the proposed Dwell Time changes on 20<sup>th</sup> May 2011, the drafting of a report to NIAUR is now under way. NIAUR's initial view is that there are no issues with the proposed amendments but that the final review may have to be undertaken in conjunction with CER. **ACTION: SONI to follow up on the EirGrid approval process and confirm expected timings.**
- Cathal Martin raised the issue of whether Dwell Time applies to wind farms as they technically do not have a Dwell Time. Tom McCartan clarified that the existing wording of the Grid Code also requests a dwell time parameter to be submitted from WFPS and therefore they should continue to simply enter '0' as the appropriate value as they currently do at present. The Chairman confirmed that Cathal Martin's comments will be noted in the report to NIAUR.

#### 6. Other Grid Code changes being considered

##### 6.1 Interconnector Changes – in preparation for EWIC

- The Chairman explained to the Panel that the introduction of the East-West Interconnector into the Republic of Ireland Grid Code will require multiple changes to, among others, the Connection Conditions and the Planning Code, with the main impact on the work of the GCRP happening on the Scheduling and Dispatch Code, for example through the inclusion of the word "Interconnector" in certain sections. CER have already approved changes to the Connection Conditions and the Planning Code, for example to amend the definition of "Interconnector" so as to make it more general.

Most of the work in Northern Ireland and for the GCRP will be to ensure consistency between the two Grid Codes, and to correctly align any changes.

##### 6.2 WFPS – Ramp Rate Break Point

- Negative rates are set by the Curtailment Time Interval, however the positive ramp rate is fixed to whatever SONI request the setting to be. The positive ramp rate setting is currently 5MW/min but can be between 1-10MW/min. However due to the fact that turbine designs vary from manufacturer to manufacturer, start up times after the WFPS has been shut down can vary significantly meaning they cannot comply with the Grid Code with regard to ramp rates during start-up. EirGrid have recognised this and attention was drawn to the proposal that EirGrid have recently distributed in order

to address this issue. The Chairman confirmed that the definition of 'start-up' in the Grid Code needs to be checked to ensure that it applies to a wind farm site and not to individual turbines. **ACTION: SONI to review the definition of 'start' in the Grid Code.**

- The Panel discussed the issue of the controllability of wind farms, and the fact that the Grid Code may need to be updated to reflect the increasing importance of wind farms to the system in Northern Ireland. By way of background, the Chairman mentioned the facilitation of renewables study which assessed the penetration of the Irish market by renewable generation, and which set out a number of recommendations including those centred on Grid Code compliance for wind farms. The Chairman confirmed that current work was focussing on performance indicators for existing generators and technical requirements for wind farms, ultimately focussing on a market where 40% of generation may come from wind farms.
- Cathal Martin stated that a further implication of the Ramp Rate Break Point for WFPS was of the scenario in which SONI instruct the WFPS to operate in a frequency response mode in order to provide some of the system reserve. He stated that a reduction below 50% may turn off the turbine and leave it with no reserve. At present the WFPS will only be instructed to operate between 50-100% of instantaneous output when providing reserve so this is currently not an issue, Juliet Corbett asked whether this was an issue for the GCRP, to which the Chairman confirmed that this was the case, but that there are timing disconnects between EirGrid and SONI as the former does not have to follow a formal consultation to make amendments to the Grid Code. Juliet Corbett asked the Panel Members whether the consultation process is required, to which several Panel Members stated that it was an important process and should not be bypassed.
- **Action: SONI to continue discussions with SSE Renewables and other stakeholders to progress these issues.**

### 6.3 DSU – to allow DSU to export

- The Chairman informed the Panel that in Northern Ireland, Demand Side Units (DSUs) are able to reduce demand through the use of embedded generation, subject to the rule that the DSUs could not export. All relevant terminology in the NI Grid Code refers to 'demand reduction'. However in the Republic of Ireland discussions are ongoing with DSU operators to enable DSU's to both reduce demand and export.
- EirGrid have been developing a proposal which is being put to the EirGrid Panel today for discussion (8<sup>th</sup> June 2011). SONI will require time to review this proposal, but envisage that the only potential impact would be on the Scheduling and Dispatch Code. The Chairman confirmed that a 'watching brief' applied to this item, as there is no need to take action unless it is considered necessary.
- Juliet Corbett informed the Panel that there is a need to progress necessary changes so as to integrate new users into the system in the future, and, NIAUR will seek input from both GCRPs as appropriate. The Chairman confirmed that SONI recognise the necessity of controllable generation and the need for equitable rules for any new entrants in the market.
- Waste Energy and Biomass

- The Chairman raised an additional item for the agenda regarding waste energy and biomass generation, and noted that these types of plant may exist primarily to burn waste or biomass, with electricity generation as a secondary effect. Therefore they are not easily Grid Code compliant, but nonetheless they cannot be refused connections. Brian Mongan informed the Panel that a recent court ruling had confirmed that electricity generation was not a secondary effect, however at present there is no policy in Northern Ireland concerning these types of plant. The general issue of the controllability of such plants, together with ramp down and switch-off issues, was discussed by the Panel, and it was decided that there was a need for a sub-group to be formed to progress discussions on these issues.
- David MaCartney asked how these issues and arrangements would be affected by the evolving EU frameworks; Bronagh McKeown confirmed that she would touch on this in her later overview of EU activities. The point was raised that any Grid Code issues should be dealt with now, and there is a risk of delay due to the slow implementation of EU regulation (for example, as with the Directive regarding reporting).
- NIAUR confirmed that they would like to start reporting on barriers to entry for waste energy and biomass generation, and that this should be a joint exercise for the two GCRPs. SONI confirmed that the appropriate forum for the start of this process should be the next JGCRP. NIAUR also confirmed that it will be undertaking further consultation on priority despatch and related issues.
- **ACTION: a small working group to be established to progress the discussion.**

## 7. WFPS Testing Document – Update

- The Chairman reported to the Panel that the sub-group covering this item has met recently and has issued a consultation document. Conor O’Doherty confirmed to the Panel that SONI was very close to publishing its consultation response, and that version 2 of the Guidance Notes for WFPS Developers will be published soon.
- The ‘Guidance Notes for WFPS Developers’, as they are currently known, will be renamed to “WFPS Settings Schedule”, and that document will become bound by the governance process of the Grid Code.
- The Chairman acknowledged the comments sent through via email by Joe Duddy on 26<sup>th</sup> May 2011, and informed the Panel that certain items will be dealt with through individual communications which will subsequently be shared with the Panel.

## 8. Technical Parameters

- The Chairman informed the Panel that this item has not progressed recently. Ultimately an agreement on technical parameters is hoped for; however if no agreement is reached then derogations should be sought (as is the case for Kilroot). No GCRP involvement would be needed in this process.
- **ACTION: SONI to progress this item with Ballylumford and Coolkeeragh separately.**

## 9. Any other business

- European Codes update
  - Bronagh McKeown provided an overview of this item, following on from discussions held at the last JGCRP and GCRP on 23<sup>rd</sup> February 2011. The GCRP was confirmed as the appropriate forum for Members to discuss the interaction between the Northern Ireland and EU Grid Codes, however it was noted that most if not all Members will have separate involvement in the process through other bodies, for example ACER.
  - Regulation 714/2009 sets out the various codes that the EU requires to be developed, and Bronagh McKeown emphasised the direct applicability of regulations in Member States, that the aim of Regulation 714/2009 is to harmonise many matters, and therefore this means that Member States are prevented from making their own amendments to the European Codes. Therefore as soon as the Network Code is developed and formally accepted by the European Union, it becomes fully binding in Northern Ireland.
  - Any discussion of the impact of, for example, the Network Code in Northern Ireland would need to happen in Brussels, as the GCRP as a body is unable to influence the development of the Network Code. ENTSO-E is currently drafting frameworks, which will be presented to ACER and then to the European Commission. Following this the process of comitology will take place.
  - NIAUR confirmed to the Panel that interested Members should be working through their relevant representatives, i.e. TSOs, governments and industry bodies. A concern was raised that the risk of the new Codes could be high for Northern Ireland, due to its small size (and its limited ability to input into the drafting process) and its mix of generation. It was noted that Northern Ireland has no separate representation in the EU (although it sets its own energy policy), and NIAUR is working towards an MOU to formalise its position with Ofgem, which would allow NIAUR to act as an office of Ofgem and thereby gain the opportunity to input into EU-level discussions. SONI also noted that they have a formal place at the ENTSO Assembly, but that the presence is small compared to, for example, German and French TSOs.
  - A question was raised concerning derogations from the new European Codes; the consensus was that derogations will be less likely. However there will be areas that will not be covered by the European Codes, which will allow for some discretion.
  - **ACTION: SONI to publish any relevant consultation documents on the Grid Code section of its website, and to send the same through to the Panel Members. SONI will also discuss the role for TSOs to generate input from stakeholders.**
  - **ACTION: an update on European Code work will be added as a standing agenda item for future GCRPs (as is the case for the JGCRP).**
- Secondary Fuel GPIs

- Brain Mongan raised this item on behalf of Ian Luney. The HAS consultation proposed that Secondary Fuel GPIs may be charged for; however it was noted that the Grid Code does not deal with Secondary Fuel.
- **ACTION: SONI to review the responses to the HAS consultation and confirm whether there are sufficient grounds to take this item forward.**
- List of sub-groups
  - Cathal Martin raised this item on behalf of Joe Duddy, who had requested details of all sub-groups in his email of 26<sup>th</sup> May 2011. The Chairman confirmed that at present only the wind sub-group was active, but that an individual response to Joe Duddy would be provided.
  - **ACTION: SONI to respond to Joe Duddy separately.**

**10. Arrangements for next meeting**

- The next meeting of the GCRP will be held on the same date as the next JGCRP. No firm date has been set for the JGCRP but SONI anticipate that this will be in September 2011.
- If there are any items that require discussion before September, an appropriate sub-group meeting will be held.