

Generator Aggregator System Operator Agreement

Grid Code Modification Report

11 December 2023



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Summary

This report and the supporting documentation are in response to the consultation on the proposed Generator Aggregator System Operator Agreement (GASOA) modification to the Grid Code.

SONI consulted upon the modification proposal for a period of 6 weeks between 05/10/2023 - 16/11/2023 and there were no responses received to this consultation.

During the consultation process, SONI identified two minor relevant updates that were required to improve the modification and updated the proposal accordingly.

The modification was presented and discussed at the Grid Code Review Panel on 27/09/2023 pre-consultation and on 06/12/2023 the updated proposal was presented and discussed at the at the Grid Code Review Panel. The Grid Code Review Panel recommended the modification be progressed for approval.

The red-line and green-line versions of the final proposed modification are included in Appendix A. Appendix B documents the supporting of the proposed modification.

The modification proposal is submitted for approval.

Modification Proposal

Overview

Generator Aggregator System Operator Agreements (GASOA) have been in use for several years. The agreements are already in place between the TSO and Generator Aggregators.

The purpose of the modification proposal is to incorporate these agreements into the Grid Code.

Background

Generator Aggregator System Operator Agreements (GASOA) have been in use for several years. The agreements are already in place between the TSO and the existing Generator Aggregators.

To formalise the use of these agreements and clarify their contents, it is proposed to incorporate GASOA into the Grid Code

Analysis & Opinion

This modification is intended to codify GASOA into the Grid Code. The modification also clarifies and improves the accuracy of existing definitions within the Grid Code related to AGUs.

As Generator Aggregators are already subject to GASOA, there is not expected to be any significant impact on Customer's.

Through the consultation process, support for the modification proposal was expressed by the Grid Code Review Panel DSU representative.

Conclusion

The modification is proposed to update the NI Grid code to incorporate agreements made between Generator Aggregators and SONI. The purpose and intention of this modification is to formalise the use of these agreements as well as clarifying their contents.

Consultation responses to proposed modification

There were no responses received to this proposed modification.

SONI proposal updates post-consultation

In addition to the original modification SONI propose to update two clauses within the Grid Code. Both Clauses are in the Operating Code and are in OC11 Part B, applicable to all user's equipment other than PPA CDGUs.

The two clauses proposed to be modified are OC11.10.1.1 and OC11.12.1.

OC11.10.1.1

Existing OC11.10.1.1 Clause

Monitoring of User's Equipment is normally continuous or continuous for periods of time, and involves the analysis of the output of **Monitoring** equipment (as required or permitted under the CC and/or relevant **Connection Agreements** and/or **SSS Agreements** and/or the **MC**), **Generator Aggregator System Operator Agreement (SOA)** or by such other methods as the **TSO** shall reasonably determine are appropriate in the circumstances. It does not require advance notification from the **TSO** to **Users**.

Proposed OC11.10.1.1 Clause

Deleted text in ~~strike-through red font~~ and new text highlighted in blue font

Monitoring of User's Equipment is normally continuous or continuous for periods of time, and involves the analysis of the output of **Monitoring** equipment (as required or permitted under the CC and/or relevant **Connection Agreements** and/or **SSS Agreements** and/or the **MC**), **Generator Aggregator System Operator Agreement (GASOA)** or by such other methods as the **TSO** shall reasonably determine are appropriate in the circumstances. It does not require advance notification from the **TSO** to **Users**.

Explanation of proposed update

Although Generator Aggregator System Operator Agreement is not currently defined within the Glossary and Definitions section of the Grid Code, in OC11.10.1.1, Generator Aggregator System Operator Agreement is a bolded term and contains the abbreviation SOA after it. SONI propose to update the abbreviation SOA to GASOA to address this issue as part of the GASOA modification.

OC11.12.1.

Existing OC11.12.1 Clause

The **TSO** may, if it reasonably considers that there may be an issue of non-compliance by the **User**, carry out an **Investigation** to acquire or verify information relevant to **User's**

Equipment design, operation or connection requirements under the **Grid Code, Connection Agreements, Generator Aggregator System Operator Agreement (SOA)** and **System Support Service Agreements** between **Users** and the **TSO**.

Proposed OC11.12.1 Clause

Deleted text in ~~strike-through red font~~ and new text highlighted in blue font

The **TSO** may, if it reasonably considers that there may be an issue of non-compliance by the **User**, carry out an **Investigation** to acquire or verify information relevant to **User's Equipment** design, operation or connection requirements under the **Grid Code, Connection Agreements, Generator Aggregator System Operator Agreement (GASOA)** and **System Support Service Agreements** between **Users** and the **TSO**.

Explanation of proposed update

Similar to the issue with OC11.10.1.1, in OC11.12.1 Generator Aggregator System Operator Agreement is not currently defined within the Glossary and Definitions section of the Grid Code, in OC11.12.1, Generator Aggregator System Operator Agreement is a bolded term and contains the abbreviation SOA after it. SONI propose to update the abbreviation SOA to GASOA to address this issue as part of the GASOA modification.

Consultation Conclusion

SONI updated the proposed modification. The updates represented a minor modification to the original proposal, and updating the proposal ensured the accuracy of the Grid Code modification. The updated proposal was presented and discussed at the Grid Code Review Panel on 06 December 2023, with no further feedback received and the modification to be progressed for approval.

Assessment against Grid Code Objectives

This modification proposal supports the objective of the Grid Code to:

facilitate the transmission system being made available to persons authorised to supply or generate electricity in Northern Ireland, on terms which neither prevent nor restrict competition in the supply or generation of electricity on the Island of Ireland;

By ensuring a level playing field for all AGUs. By including the GASOA definition within the Grid Code and clarifying the contents of such an agreement, it ensures that all AGUs are subject to the same type of agreement and introduces a standardised approach to such agreements.

SONI requests for Utility Regulator approval of incorporation of the GASOA modification

SONI recommends that the Utility Regulator approve this Grid Code modification. SONI believes that the approval of this modification will:

- Ensure that Generator Aggregator System Operator Agreement are incorporated into the Grid Code.
- Ensure that existing incongruities within the Grid Code are rectified.

Proposed Implementation Date

SONI believe that early implementation will benefit existing and potential future Generator Aggregators.

Appendix A – Modification for Approval

Red-line Version of Impacted Grid Code Section(s) - show proposed changes to text:

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GD1. Defined Terms

Aggregated Generating Unit	<p>A group of Generating Units connected to the Transmission or Distribution System and represented by a Generator Aggregator, each of which must not have a Registered Capacity greater than 10 MW. An Aggregated Generating Unit with a total Registered Capacity of 4 MW or more shall be subject to Central Dispatch (and shall therefore be a CDGU), but one with a total Registered Capacity of less than 4 MW may only be subject to Central Dispatch subject to agreement with the TSO. Unless otherwise specified by the TSO or otherwise in the Grid Code, information submitted in respect of an Aggregated Generating Unit shall always be at an aggregated level.</p> <p>The Generating Units are part of an Aggregated Generating Unit of which a Generator Aggregator has entered into a Generator Aggregator System Operator Agreement with the TSO with respect to that premise.</p>
Generator Aggregator	<p>A person who</p> <ol style="list-style-type: none">1.) represents several Generating Units, each of which does not have a Registered Capacity/Contracted Capacity greater than 10 MWMW and the combined Registered Capacity/Contracted Capacity of which is equal to or greater than 4 MW, by in particular preparing notices under SDC1, in relation to those Generating Units and receiving Dispatch Instructions in relation to those Generating Units under SDC2. For the avoidance of doubt, a Generator Aggregator cannot aggregate a Generating Unit with an output equal to or above 10 MW.

	and 2.) Is in receipt of or has signed a Generator Aggregator System Operator Agreement
Generator Aggregator System Operator Agreement	The Bilateral agreement between the TSO and Generator Aggregator , which contains the detail specific to the Generating Units which forms part of Aggregated Generating Unit

Operating Code

OC11.10.1.1

Monitoring of User's Equipment is normally continuous or continuous for periods of time, and involves the analysis of the output of **Monitoring** equipment (as required or permitted under the CC and/or relevant **Connection Agreements** and/or **SSS Agreements** and/or the **MC**), **Generator Aggregator System Operator Agreement (GASOA)** or by such other methods as the **TSO** shall reasonably determine are appropriate in the circumstances. It does not require advance notification from the **TSO** to **Users**.

OC11.12.1

The **TSO** may, if it reasonably considers that there may be an issue of non-compliance by the **User**, carry out an **Investigation** to acquire or verify information relevant to **User's Equipment** design, operation or connection requirements under the **Grid Code, Connection Agreements, Generator Aggregator System Operator Agreement (GASOA)** and **System Support Service Agreements** between **Users** and the **TSO**.

Green-line Version of Impacted Grid Code Section(s) - show proposed changes to text:

GD1. Defined Terms

Aggregated Generating Unit	<p>A group of Generating Units connected to the Transmission or Distribution System and represented by a Generator Aggregator, each of which must not have a Registered Capacity greater than 10 MW. An Aggregated Generating Unit with a total Registered Capacity of 4 MW or more shall be subject to Central Dispatch (and shall therefore be a CDGU), but one with a total Registered Capacity of less than 4 MW may only be subject to Central Dispatch subject to agreement with the TSO. Unless otherwise specified by the TSO or otherwise in the Grid Code, information submitted in respect of an Aggregated Generating Unit shall always be at an aggregated level.</p> <p>The Generating Units are part of an Aggregated Generating Unit of which a Generator Aggregator has entered into a Generator Aggregator System Operator Agreement with the TSO with respect to that premise.</p>
Generator Aggregator	<p>A person who</p> <ol style="list-style-type: none"> 1.) represents several Generating Units, each of which does not have a Registered Capacity/Contracted Capacity greater than 10 MWMW and the combined Registered Capacity/Contracted Capacity of which is equal to or greater than 4 MW, by in particular preparing notices under SDC1, in relation to those Generating Units and receiving Dispatch Instructions in relation to those Generating Units under SDC2. For the avoidance of doubt, a Generator Aggregator cannot aggregate a Generating Unit with an output equal to or above 10 MW. and 2.) Is in receipt of or has signed a Generator Aggregator System Operator Agreement

Generator Aggregator System Operator Agreement	The Bilateral agreement between the TSO and Generator Aggregator , which contains the detail specific to the Generating Units which forms part of Aggregated Generating Unit
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Operating Code

OC11.10.1.1

Monitoring of User's Equipment is normally continuous or continuous for periods of time, and involves the analysis of the output of **Monitoring** equipment (as required or permitted under the CC and/or relevant **Connection Agreements** and/or **SSS Agreements** and/or the **MC**), **Generator Aggregator System Operator Agreement (GASOA)** or by such other methods as the **TSO** shall reasonably determine are appropriate in the circumstances. It does not require advance notification from the **TSO** to **Users**.

OC11.12.1

The **TSO** may, if it reasonably considers that there may be an issue of non-compliance by the **User**, carry out an **Investigation** to acquire or verify information relevant to **User's Equipment** design, operation or connection requirements under the **Grid Code, Connection Agreements, Generator Aggregator System Operator Agreement (GASOA)** and **System Support Service Agreements** between **Users** and the **TSO**.

Appendix B – Supporting Documentation

- SPID_07_2023_GASOA_Consultation_paper
- SPID_07_2023_SGCRP_Mod_27092023_GASOA *(original proposed modification)*