

## SONI Grid Code Modification Proposal Form

Email To:  
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### Title of Modification Proposal: AGU Definition

SPID (SONI PROPOSAL ID) **SPID\_NN\_2024**

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| Date:                                                         | 12 June 2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |      |                    |
| Company Name:                                                 | SONI                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |      |                    |
| Applicant Name:                                               | Grid Code team                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |      |                    |
| Email Address:                                                | <a href="mailto:gridcode@soni.ltd.uk">gridcode@soni.ltd.uk</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Tel: | +44 (0)28 90794336 |
| Grid Code Version:                                            | SONI Grid Code version – June 2023 [Latest Version]<br><a href="https://www.soni.ltd.uk/media/documents/SONI-Grid-Code-June-2023.pdf">https://www.soni.ltd.uk/media/documents/SONI-Grid-Code-June-2023.pdf</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |      |                    |
| Grid Code Section(s)<br>Impacted by Modification<br>Proposal: | Glossary and Definitions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |      |                    |
| Modification Proposal<br>Justification:                       | <p>During internal discussions with regard to a proposed Aggregated Generating Unit to be registered in the Single Electricity Market, it came to light that the Grid Code definition of an AGU is not aligned with the Electricity (Northern Ireland) Order.</p> <p>The Grid Code implies that each member Generating Unit operated as part of an AGU must be &lt;10MW, whereas the Order provides for exemptions from licensing requirements only for Persons providing less than 10MW of electrical power.</p> <p>Thus; co-located generators comprising capacity &gt;10MW must be licensed as a single generator, and are thus precluded from market participation as part of an AGU by the Trading and Settlement Code, Part A, Article 5.186.</p> <p>As the licensing requirements originate in statute, rather than industry codes of practice, i.e. the Grid Code, Distribution Code, etc. it is proposed to modify the Grid Code to remove the above ambiguity, mitigating the possibility that any participant could infer from the Grid Code that co-located generators comprising capacity &gt;10MW could participate in an AGU.</p> |      |                    |

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

Deleted text in ~~strike through font~~ and new text highlighted in **blue font**

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| Refer to SPID_nn_2024_AGU_definition_redline                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Green-line Version of Impacted Grid Code Section(s) - show proposed final text: |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Refer to SPID_nn_2024_AGU_definition_greenline                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Defined Terms (Bold):</b>                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Aggregated Generating Unit</b>                                               | A group of <b>Generating Units</b> connected to the <b>Transmission</b> or <b>Distribution System</b> and represented by a <b>Generator Aggregator</b> , each of which must not have a <b>Registered Capacity</b> greater than 10 MW. The sum of <b>Registered Capacities</b> of member <b>Generating Units</b> located at a given <b>User Site</b> must also be less than 10MW. An <b>Aggregated Generating Unit</b> with a total <b>Registered Capacity</b> of 4 MW or more shall be subject to <b>Central Dispatch</b> (and shall therefore be a <b>CDGU</b> ), but one with a total <b>Registered Capacity</b> of less than 4 MW may only be subject to <b>Central Dispatch</b> subject to agreement with the <b>TSO</b> . Unless otherwise specified by the <b>TSO</b> or otherwise in the <b>Grid Code</b> , information submitted in respect of an <b>Aggregated Generating Unit</b> shall always be at an aggregated level. |
| <b>Implication of Not Implementing the Modification:</b>                        | <p>If the Grid Code is silent or ambiguous with regard to explicit provisions (and exclusions) within the Electricity Order, a participant could make incorrect inferences with regard to the legality of licensing arrangements they may then pursue. Respecting the legal hierarchy in which national legislation takes precedence over industry codes of practice may require such a participant to re-evaluate a given project's feasibility.</p> <p>Pursuant to Condition 16 of SONI's Licence, it is incumbent upon SONI to remove any ambiguity; the proposed modification seeks to achieve this – and, if not implemented, ambiguity remains.</p>                                                                                                                                                                                                                                                                           |
| <b>Assessment</b>                                                               | <p><b><u>Overview:</u></b></p> <p>The purpose of this modification is to ambiguity potentially arising from the non-alignment between the Electricity (Northern Ireland) Order and the SONI Grid Code by clarifying the definition of an Aggregated Generating Unit.</p> <p><b><u>Background:</u></b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|  | <p>The Grid Code implies that each member Generating Unit operated as part of an AGU must be &lt;10MW, whereas the Order provides for exemptions from licensing requirements only for Persons providing less than 10MW of electrical power.</p> <p>Thus; co-located generators comprising capacity &gt;10MW must be licensed as a single generator, and are thus precluded from market participation as part of an AGU by the Trading and Settlement Code, Part A, Article 5.186.</p> <p>As the licensing requirements originate in statute, rather than industry codes of practice, i.e. the Grid Code, Distribution Code, etc. it is proposed to modify the Grid Code to remove the above ambiguity, mitigating the possibility that any participant could infer from the Grid Code that co-located generators comprising capacity &gt;10MW could participate in an AGU.</p> <p><b><u>Analysis &amp; Opinion:</u></b></p> <p>Under GD1 as written, an Aggregated Generating Unit is defined as, “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”. The modification seeks to leverage the existing definition of a User Site in GD1 by inserting the following clause; “The sum of Registered Capacities of member Generating Units located at a given User Site must also be less than 10MW.”</p> <p><b><u>Conclusion:</u></b></p> <p>This modification is required to ensure the SONI Grid Code is aligned with the Electricity (Northern Ireland) Order, specifically with regard to exemptions from licensing requirements for persons operating generating equipment.</p> |
|  | <p>SONI Ltd., Castlereagh House, 12 Manse Road, Belfast, BT6 9RT</p> <p>Phone: +44 28 90 794336</p> <p>Email: <a href="mailto:gridcode@soni.ltd.uk">gridcode@soni.ltd.uk</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |