

MINUTES OF THE SONI GRID CODE REVIEW PANEL MEETING

Held at the Radisson SAS Hotel, Belfast

On 23 February 2011 at 11:00

Present:

Members/Alternates	Representing	
Dick Lewis	SONI	Chairman
Adrian Henning	SONI	As an observer for SONI
Michael Preston	SONI	As an observer for SONI
Leslie Burns	SONI	As an advisor for SONI
Bronagh McKeown	SONI	As an observer for SONI
Connor O'Doherty	SONI	As an advisor for SONI
Tom McCartan	SONI	(Alternative for Alex Baird)
Jim Cooke	Coolkeeragh ESB Power Station	Generator
Denis McBride	AES Ballylumford	Generator
Ian Luney	AES Kilroot	Generator
Cathal Martin	SSE	Generator
Billy Walker	UregNI	Regulator
Juliet Corbett	NIAUR	Regulator
Ewan Powrie	Secretary of the GCRP	

1. Chairman's Introduction to the Meeting (Item 1)

- Dick Lewis welcomed the Panel Members and gave an overview of the agenda.

2. Apologies for absence (Item 2)

- The Chairman noted that apologies had been received from Brendan Woods (SONI), Alex Baird (SONI), Alan Kennedy (SONI) and David MaCartney (NIE Energy PPB).

3. Minutes of the Grid Code Review Panel Meeting held on 9th September 2010 and 25th November 2010

- The Chairman produced two sets of minutes to the Panel:
 - 9 September 2010; and

- 25 November 2010,

both of which were approved by the Panel without comments.

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

- There were no other points arising from the minutes.

5. Update on approval of Fail to Sync and Fail to reach Min Gen proposed changes

- Dick Lewis reported that approval for the proposed changes has been received from NIAUR. The changes will be documented in a final version of the Grid Code and the relevant sections will be distributed to the Panel Members.
- The final step will be to publish the revised Grid Code on the internet (which will incorporate other minor amendments as discussed below).

6. Review of OC11

- Dick Lewis introduced the topic, and reminded the Panel that there have been two recent consultations on the amendments to OC11: (1) the main consultation setting out the proposed changes to OC11 which closed on 14th January 2011, and (2) the consultation on the Agreed Testing and Monitoring Procedure, which closed on 22nd February 2011.
- Leslie Burns proceeded to lead the discussion on OC11. The only response received to the first consultation was from NIE Energy PPB, who raised two main points:
 - *Definition of “Agreed Testing and Monitoring Procedures”*: PPB sought to reinforce the fact that it is a procedure under the Grid Code. SONI accepted the point and the definition is now in agreed form.
 - *Section 11.5.4(g) regarding the validity of Post Event Notices*: this was removed from OC11 in the original consultation. PPB disagreed with this approach and requested its reinstatement to ensure consistency between the GUAs and the Grid Code. SONI reviewed the GUAs that they had sight of, and in order to ensure that any future changes to the GUAs regarding PENs would be covered, reinstated the original wording together with the following additional wording: “to the extent that these provisions have been notified to the TSO in writing”, to ensure that future changes to the GUAs could be accommodated. PPB maintain their disagreement with the current drafting for section 11.5.4(g), and further discussion is necessary.
- Dick Lewis confirmed that given the outstanding issues with PPB, there may be a need to revise and reissue the report to NIAUR and the proposed changes to OC11. The Panel will be kept informed of progress.
- PPB also provided examples to SONI of items in the GUAs that they thought should be reflected in the Grid Code:
 - *TSO may only issue one PEN for any period of Monitoring*: SONI maintains that this is not a point on validity as such, and SONI hopes to resolve this issue without any further drafting. If further drafting were to be deemed

necessary, it could be placed above the wording on validity in the proposed Parts A and B of OC11.

- *Longstop dates for PENs:* PPB have raised their concern that no longstop dates are built into the Grid Code to limit the time during which the validity of a PEN can be disputed, and that the 72 hour restriction set out in the GUAs should be replicated in the Grid Code. SONI feels that as this would encompass a form of dispute resolution, the Grid Code is not an appropriate document for this type of provision (dispute resolution being properly dealt with under contract), although the inclusion of a 72 hour longstop date may be acceptable.
- SONI will report back to the Panel Members on the outcome of its discussions with PPB, and will distribute its published conclusions. SONI hopes to finalise the matter within the next week or two.

7. Technical Parameters

- Dick Lewis provided an update of ongoing issues. Jim Cooke confirmed that he has put forward proposals but SONI have yet to progress these. Tom McCartan confirmed there was no debate on this matter at present.
- Jim Cooke raised the question that once the Technical Parameters are finalised, will there be any penalties associated with existing non-compliance. Dick Lewis confirmed that there will be no retrospective charging or recovery, as this would be unreasonable.
- Tom McCartan raised the point that there is still no synergy between the Grid Code Parameters and the Technical Parameters. **Action: SONI to pursue this issue for Ballylumford and Coolkeeragh.**

8. Constraints

- Transparency of Information

Ian Luney opened a discussion on transparency of information, and raised the point that the transparency of the decision-making on constraints was an important issue for generators, and that there are no provisions in the Grid Code or the TSC to encourage such transparency. Ian Luney suggested that a weekly report sent to all interested parties setting out constraints information would be a suitable approach, to ensure parity for all participants and to aid in more efficient planning and scheduling (the example of coal procurement for Kilroot being a case in point). EirGrid currently produce a monthly report to track rolling availability, and Ian Luney suggested that a coordinated report from EirGrid and SONI on transmission system status would be appropriate.

Dick Lewis confirmed that an outage plan is available, but that the type of updates Ian Luney is requesting are not a Grid Code issue. Ian Luney raised the point that the outage plan does not cover transmission outages. In response to a point raised by Tom McCartan, namely how will Generators know what information will be relevant, Juliet Corbett (NIAUR) stated that this would be a matter for the Generator to determine. Several SONI representatives raised the concern that SONI should not be distributing information that may be inaccurate if Generators will be relying on this information in their planning and procurement decisions; however all present agreed that Generators should have access to information which will facilitate effective planning.

Action: SONI to identify the EirGrid reports mentioned by Ian Luney, and to assess whether its information is included in this report. If this is not the case, SONI to assess viability of issuing a similar report.

- Industrial Emissions Directive (“IED”)

Ian Luney raised the issue of long-term constraints and how to influence the TSO to invest in resolving these constraints. Dick Lewis confirmed that if NIE and SONI agree to any investment this will still have to be approved by EirGrid. Ian Luney requested that Generators be kept informed of anything that could impact on generation.

Any follow-up will continue outside of the GCRP forum, although whether or not decision-making regarding investment in resolving long-term constraints is a TSC or Grid Code issue is unclear; Juliet Corbett raised the point that these matters should be dealt with under the banner of transparency in the SEM rather than as purely legal requirements.

9. Minor Updates to Grid Code e.g. incorrect references, administration errors

- Dick Lewis presented a short overview of the minor errors that have been identified and that SONI propose to amend in the next version of the Grid Code. All were uncontroversial and drew no comments from the Panel Members.
- SONI will be issuing a brief report to NIAUR requesting their consent for the changes. The changes will then be incorporated into the Grid Code together with the changes from the Failure to Sync consultation.

10. Any other business

- Moyle Interconnector

Dick Lewis informed the Panel that there has been an ongoing discussion with parties regarding the capacity of the Moyle Interconnector. There has been a recent change from 80MW to 295MW in the East to West direction.

SONI and National Grid will be publishing their methodology statement as to how these capacities are agreed and how they can be changed. National Grid and SONI are trying to establish a methodology to ensure that the full capacity of Moyle is made available. Tom McCartan raised the point that Moyle’s reserve capability would be lost if it was running at its full 500MW capacity.

- Dwell Time

Dick Lewis confirmed that no concerns had been raised about these arrangements. Changes to the Grid Code will be required, and SONI will issue the proposed changes for consultation and, following the consultation, seek approval from NIAUR for the changes.

An error in the wording for “Dwell Time Down” and “Dwell Time Trigger Point” has been identified by Tom McCartan; the error will be amended prior to the consultation being issued.

- Ramping Rates of WFPS

An issue regarding wind farms was raised by Cathal Martin. The process of wind farms ramping up from standby mode can cause a delay in starting. If the delay continues for an extended period of time, this could result in a technical violation of the Ramp Rate, thereby causing a Grid Code violation. EirGrid have acknowledged this issue and are seeking to define a 'minimum load' for wind farms. A proposal is being discussed at the EirGrid GCRP on this issue. **Action: SONI to review EirGrid's proposed modifications with a view to discussing with them the merits of making these changes.**

- Wind farms: SONI Guidance Notes

Cathal Martin raised this issue, and made reference to the fact that little has happened in this area for some time, and that the Guidance Notes are still in draft form. Dick Lewis responded, stating that amendments have been made to the Guidance Notes but generally the document is tailored to specific parties. However SONI intends to put the matter out for a full Grid Code consultation in the near future.

Cathal Martin asked where the Guidance Notes will sit within the Grid Code, to which Dick Lewis responded that technically the document will sit outside the Grid Code but will be managed and subject to the control of the GCRP. Cathal Martin raised further concerns regarding the imposition of further requirements at a later date that wind farm generators will be forced to adapt to. Dick Lewis stated that in circumstances where the technology and requirements are incompatible a derogation could be sought.

- Fuel Security Code

Billy Walker introduced this topic. Responses to DETI's statutory consultation on a revised Northern Ireland Fuel Security Code have been received from several parties. A meeting with SONI has been held and DETI will be updated with information from this meeting. A final paper is due to be submitted by the end of March. DETI may also wish to meet stakeholders individually; these meetings will take place before the end of March.

Dick Lewis asked whether the Grid Code will need to be amended. Billy Walker confirmed that the only possible change would be very minor, to simply introduce a reference to the Fuel Security Code. The Panel proceeded to discuss issues regarding fuel stocking, including the requirements placed under GUAs and licences, as well as the fact that fuel security requirements are not currently harmonised between Northern Ireland and the Republic of Ireland, although the regulators are working towards this.

- Billy Walker requested that generators provide the regulator with information regarding stocking requirements. Juliet Corbett agreed that NIAUR would provide a summary of information to Ian Luney for his input.

11. Arrangements for next meeting

- Working sub-groups will continue with their current tasks. The next meeting of the GCRP will be held on the same date as the next JGCRP, which is due to be held on Wednesday 25th May in Dublin.