

12 February 2021

Emailed to: OpsCompliance@eirgrid.com

RE: Annual Audit of the Scheduling and Dispatch Process – 2020 and 2021 Terms of Reference

Wind Energy Ireland (WEI) welcomes the opportunity to engage with EirGrid and SONI and provide feedback on the proposed terms of reference for the audit of the scheduling and dispatch process in 2020 and 2021.

WEI is the largest representative body for the Irish wind industry, working to promote wind energy as an essential, economical and environmentally friendly part of the country's low-carbon energy future.

WEI has a very active dispatch down working group of over 15 members which covers approximately 80% of the operational windfarms in Ireland. It was established as an interface between windfarm owners & operators and the TSOs (Eirgrid & SONI), to address concerns relating to constraint and curtailment in both the Republic and Northern Ireland. Due to the large number of windfarm owners and operators within the working group, and the impacts of dispatch down on wind generators, the group has led the formulation of this response and has put forward a number of proposals and comments in relation to the current consultation and the scheduling and dispatch audit process in general.

As the proposed scope for the 2020 and 2021 audit has not changed, this response considers not only the current consultation, but also the most recent scheduling and dispatch audit report carried out by PWC. In doing so we also take this opportunity to highlight areas for improvement that we would like to see addressed in the 2020 and 2021 audit.

Selection and Appointment of Auditor

Due to the technical and very complex nature of the dispatch down contractual and internal operations it is our view that a more appropriate audit would either include, or be carried out in

its entirety by, an auditor with electricity grid or market experience who is already familiar with dispatch down operations, and can adequately assess shortfalls in the process, that we outline below, and which have already been acknowledged by the TSOs in our ongoing discussions with them. We believe this is something that should be addressed for the upcoming audits.

Transparency

Given the importance of dispatch down for renewable generators, our concern is that the TSOs are not always fully complying with their statutory responsibility to minimise the dispatch down of renewable generation as per the 2009 RES-E directive. We believe the audit should analyse curtailment and constraint events to ensure the TSOs are taking all possible actions before dispatching down renewables (e.g., are there instances where counter-trading on the interconnectors or actions to reduce minimum generation on conventional generators could have been taken to minimise curtailment?). The most recent audit does not include information on the sample periods or data used in the audit and how these came to be decided on, so it is difficult for industry to have any insight into what exactly was reviewed and how effective the TSOs' processes are. We propose that subsequent audits provided much more detailed information on the analysis and data used which will be of much more benefit to industry.

The following sections are structured as per the scope items offered in the most recent PWC audit:

Priority Dispatch and Cross Zonal Actions

As per regulatory requirements, curtailment events are to be applied pro-rata using the available active power of a windfarm. The current curtailment application methodology has two obvious shortfalls which have been acknowledged by the TSOs and have not been discussed or highlighted in the most recent PWC audit:

1. Currently the calculation of the curtailment split between ROI and Northern Ireland is done by calculating the desired MW to be curtailed All-Island and then applying a 4:1 ratio between the two jurisdictions, resulting in the MW setpoints to be applied to individual windfarms. As per regulatory requirements, the MW to be curtailed should be apportioned pro-rata and not divided up on a jurisdictional basis first. Evidence of excessive curtailment of windfarms in Northern Ireland compared to those in the Republic of Ireland has been provided by WEI to the TSO.

2. Currently the initial MW setpoint issued to a windfarm is calculated as a percentage of its available power in real time, whereas every subsequent setpoint is calculated as a percentage of the initial setpoint and not the real-time available power of the windfarm. The negative impact of this is windfarms are locked in at their initial setpoint MW value, irrespective of whether their available active power subsequently increases, resulting in considerably more dispatch losses than initially calculated. This has a greater affect on the larger groups of windfarms due to the direction of the prevailing winds.

We believe the audit should analyse and address where there are flaws in current processes that do not meet the TSOs' statutory obligations rather than solely analysing whether the processes were complied with or not.

Conventional Unit Minimum Generation.

The main attributer to curtailments at times of high renewable penetration is the provision of minimum generation from conventional thermal units for system security. The most recent audit states

“Before a curtailment event occurred, other options were considered, including but not limited to, initiating Interconnector trades or turning down conventional units to their minimum generation where applicable”

The report does not present any findings as to whether the curtailment set points issued are indeed in line with the technically capable minimum generation of the unit. We recommend assessing the minimum generation levels offered by the conventional generation units against the actual minimum generation levels during curtailment events to see whether all appropriate actions were taken before curtailment of renewable generation.

Constraint Flagging

In previous engagements with the WEI dispatch down working group, the TSOs acknowledged that there have been incidents of constraints being incorrectly tagged as curtailments for Northern Ireland windfarms. This was not picked up in the PWC audit, perhaps because of the sampling method or due to the scope omissions. For this reason, we recommend that the 2020 and 2021 audit should progress one of the following options:



1. Instead of analysing a subset of data from the reporting period the full data set should be used.
2. Allow for submissions from third parties of periods of data to be used in the analysis. We would welcome further engagement on this,

Conclusion

In conclusion we thank EirGrid & SONI for offering us the opportunity to provide feedback on the proposed terms of reference for the audit of the scheduling and dispatch process in 2020 and 2021. We are available to discuss any of these points if you wish.

Yours sincerely,

A handwritten signature in black ink that reads "Bobby Smith". The signature is written in a cursive, flowing style.

Bobby Smith
Senior Policy Advisor
Wind Energy Ireland