



**IWEA response to the EirGrid/SONI consultation on  
EirGrid's Draft Guidelines for Met Signals**

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Submitted via email to [wind.forecasting@eirgrid.com](mailto:wind.forecasting@eirgrid.com)

Dear Sir/Madam,

This letter sets out the views and observations of the Irish Wind Energy Association (IWEA) on EirGrid's Draft Guidelines for Met Signals. IWEA very much welcomes the opportunity to make this submission.

IWEA is the leading renewable energy representative body in Ireland and as such has an active interest in the potential and capacity for renewable energy development, and in particular wind energy, in Ireland. IWEA works in a proactive and engaging manner with stakeholders in this area and as such feels it is both appropriate and important to make a submission on this subject.

As discussed IWEA believes EirGrid are issuing the guidelines prematurely in advance of concluding the review of met signal requirements. However, IWEA understands that EirGrid feel the need to introduce guidance in this area and due to the delays in the ongoing review cannot wait until it concludes. IWEA believes it is crucial that pre-existing and new sites are distinguished in the guidelines and that the requirements for both are reasonable and practical.

The remainder of this letter is made up of the more detailed technical comments on the guidelines, IWEA members remain available to discuss further.

Comment No:	Guideline Ref	Comment
1	Throughout	Document to set out requirements for pre-existing and new sites separately
2	Section 2	In the introduction, it refers to "Met mast and study alternatives", IWEA requests that this should be clarified that this analysis is ongoing and guidelines will be reviewed and updated following conclusion of this study.

3	Section 4.1	Why are all current\IPP proposed sources not deemed acceptable in this interim period, i.e. until the ongoing study has concluded?
4	Section 4.1	Why is nacelle only data not an option provided?
5	Section 4.1	Why is 10MW – 15MW subset created, is more flexibility possible on threshold?
6	Section 4.1	Item 2 in Acceptable Sources suggests two sources of met data, a 30m met mast and a WTG source. How is this data to be presented? Is it to be averaged? Max/min to be provided? Are EirGrid expecting both signals to be provided (note: not required under Grid Code)?
7	Section 4.1	Item 3 in Acceptable Sources, a neighbouring WFPS met mast can be used. How will the signals be duplicated to EirGrid (EirGrid internally, or must the signal go separately i.e. “own” WFPS” TSO RTU)?
8	Section 4.1	Confirmation that wind speed signal from WTG is that from one turbine or can be based on cluster of turbines, which may be more representative.
9	Section 4.1 & 4.2	How was 5km determined, is more flexibility possible on threshold?
10	Section 4.1 & 4.2	Why is only one nacelle data position acceptable?
11	Section 4.3	Accuracy levels required for wind direction, air temp and air pressure are these appropriate given importance level assigned to them?
12	Section 4.3	EirGrid have proposed accuracy levels that must be met but in Section 4.1 and 4.2 have constrained the WF in how the signals are provided. If EirGrid define an accuracy requirement, why are they concerned with how that target is met? It is conceivable that for a particular wind farm that Section 4.1/4.2 requirements are met, but that it is not possible to meet Section 4.3 requirements, but by using alternatives, not specified in 4.1/4.2, Section 4.3 requirements are fulfilled?
13	Section 4.3	Is there any minimum requirement of data coverage for 3 month periods to be assessed? (i.e. typically met mast is power by nearest turbine therefore any maintenance/downtime will result in no power supply at mast.)
14	Section 4.3.1	EirGrid has a Document “Quality Standard for Wind Farm Power Station Available Active Power (AAP) Signal”, there should be a reference to this document calculation of AAP.
15	Section 4.3.1	What formulae is used to go from wind speed to active power, are site losses accounted for, is power curve used? Also will site shutdown be taken into account?
16	Section 4.3.1	Why is wind power generation to be calculated (i.e. relevance?)
17	Section 4.3.1	Outline modelling step to be completed to predicted wind farm power output from either forecaster/measured wind speed. The result of this will impact error calculation with AAP and consequently standard percentage cut-off.
18	Section 4.3.1	Depending on wind farm siting and size, met mast location may not be wholly representative of turbine group, leading to erroneous results in predicted average wind farm output.
19	Section 4.3.1 & 4.3.2	Where is forecasted wind speed obtained from?
20	Section 4.4	Why are co-ordinates for every turbine required?
21	Section 4.4 & 4.5	Contact points and process for DSO sites to be defined.
22	Section 4.4	“TSO Connected WFPS Operating Protocol document – When & to who is this document supplied?
23	Section 4.4	High wind speed shutdown information: guideline on level\type of info required?
24	Section 4.4	Points v. to viii.: guideline on level\type of info required?
25	Section 5	3 months is insufficient time if new met mast is required. Also pre-existing sites to be differentiated
26	Section 5	Does application for temp derogation avoid category 1 being applied to the site for non-conformance?

Yours sincerely,

A handwritten signature in black ink, appearing to read "David Connolly". The signature is written in a cursive style with a large, sweeping initial 'D' and a long, horizontal flourish at the end.

David Connolly  
Head of Policy