

## IWEA submission on Report on RoCoF Alternative Requirements

19 February 2016

The Irish Wind Energy Association (IWEA) welcomes the opportunity to comment on the Phase 2 Study Report on the RoCoF Alternative & Complementary Solutions Project.

As outlined in previous submissions, IWEA's overriding objective with the DS3 arrangements is that they **must deliver the necessary system services and any required investment for services to facilitate the achievement of the 2020 renewable targets and minimise curtailment**. The delays that have been seen to date in increasing the System Non-Synchronous Penetration (SNSP) on the electricity system are of serious concern to the wind industry, and wind generators are likely to see increasing levels of curtailment if these system services are not introduced in a timely manner, thereby putting the 2020 renewable energy targets at risk. IWEA calls on EirGrid to provide more detailed and up to date curtailment reporting which identifies the issues that are resulting in curtailment so that these can be appropriately addressed.

The report notes that the RoCoF Grid Code workstream is on track, however the results of the studies are not yet available and it is not yet clear if the generation fleet will be able to deliver the Grid Code modification. Until there is sufficient information available in relation to the capability of the fleet, IWEA believes that the best approach would be to continue with the alternative solutions project to ensure continued progress in this area. EirGrid should continue to study the potential benefits of the technology studies in this workstream and any further solutions arising from it.

We note that the paper states that further analysis on alternative solutions to the RoCoF issue should only be performed if results from the primary RoCoF projects indicate that alternatives are required. As stated above, IWEA believes there is value in continuing this workstream to identify further potential benefits. In parallel, IWEA proposes that, on review of the studies from the higher priority generators, a detailed assessment should be made to determine the extent and the urgency with which this workstream should be further progressed. The results of the studies should give an indication of the level of compliance with the Grid Code Modification. IWEA acknowledges that the resources are best spent in ensuring delivery of the Grid Code Modification, however there may also be aspects of this workstream which could be advanced which would bring additional benefit to the system.

IWEA welcomes the work that has been carried out to date, that the project has demonstrated that alternative solutions are available to resolve the RoCoF issue and that there is scope for further work to be carried out in this area. It is important to recognise that, even if there is successful delivery of the Grid Code Modification, much of this work may also be relevant to further system changes and developments which may be required in the longer term. Consideration should be given to developing these requirements, for example through the system services mechanism, with a view to further reducing curtailment and increasing the levels of renewable generation.

The Government White Paper, published in December 2015, outlines the policy pathway to 2050 and 2100:

*“Our vision of a low carbon energy system means that greenhouse gas (GHG) emissions from the energy sector will be reduced by between 80% and 95%, compared to 1990 levels, by 2050, and will fall to zero or below by 2100.”*

IWEA believes that these studies will help contribute to the longer term decarbonisation of the energy system by identifying sources of synthetic inertia and highlighting some of the parameters that need to be identified, and concerns that need to be resolved, to ensure synthetic inertia can contribute to the safe operation of the electricity system. This is of particular importance when we look beyond 2020 to the 2030 package which has been set out by the European Commission. According to the European Commission, the Energy Union Paper restates the Union’s message on renewables that:

*“The European Union is committed to becoming the world leader in renewable energy, the global hub for developing the next generation of technically advanced and competitive renewable energies. The EU has also set an EU target of at least 27% for the share of renewable energy consumed in the EU in 2030.”*

In light of this IWEA calls on EirGrid to look at what the needs of the system will be beyond 2020, taking into account further decarbonisation of the energy system. Ireland, with EirGrid at the helm, is at the forefront of integrating large levels of renewable generation relative to the size of the system, and it is essential that work continues in this regard. It is essential that no assumptions are made in relation to the capability of the fleet to comply with the Grid Code Modification until the results of the studies are available to confirm this. Therefore we would urge that work on the alternative solutions project continues to cover the possibility that the Grid Code Modification may not be delivered, and so that the associated benefits can be achieved if and when required.