

Minutes of Distribution Code Review Panel Meeting – 8th Mar 2016

<u>Present:</u>	Brian Tapley (BT)	Chairman
	Keith Moore (KM)	Secretary
	Derek Hynes (DH)	DSO Representative
	Tony Hearne (TH)	DSO Representative
	David Cashman (DC)	TSO Representative
	Stephen Walsh (SW)	ESB Networks
	Mary O'Mahony (MOM)	ESB Networks
	Lisa McMullan	EirGrid
	Catherine Joyce-O'Caollai (CJ)	Major Customers Representative
	Ger Beatty (GB)	Synchronous Generators Ireland
	Peter Kavanagh (PK)	ISEA Representative
	Brian Mulvihill (BM)	PES Representative/ Independent Suppliers Representative
	Mantas Vencius (MV)	CER Representative
	Robert O'Rourke (ROR)	CER Representative
	Ciaran Donnelly (CD)	Embedded Generators Representative
<u>Apologies:</u>	Michael O'Hara (MOH) (Alternate Not Present)	ETCI Representative
	Sean Doolin (SD) (Alternate Present)	PES Representative/ Independent Suppliers Representative

1. Round table introductions

Round table introductions for new attendees.

- Brian Tapley commenced role as new Chairman of DCRP.
- Lisa McMullan introduced as new TSO Representative, taking over from David Cashman at the next DCRP meeting

2. Review of Previous Minutes

KM presented minutes of the last DCRP meeting (15th December 2015) and highlighted recent proposed changes submitted by PK in relation to Power Park Modules and Solar discussions. All changes were accepted by the panel and agreed as final for publication.

These minutes will be published on the ESB Networks website.

3. Update on the implementation of approved modifications #22, #23 and #24

KM provided an update:

- Wind Farm customers have been requested to apply for extensions to existing temporary derogations expiring at the end of the year or apply for permanent derogation applications to these temp derogations if compliance is not deemed to be possible for the customer.
- Over 170 derogation applications received since beginning of September 2015 relating to modifications 22,23,24.
- The SOs endeavour to complete derogation assessments for most derogation applications, for submission to CER, by April 2016.

4. CER decision on Distribution Code Modification Proposal #28 [not formally submitted] (Distribution Code Modification Implementation Process)

ROR advised that CER were unable to give an update at this time.

TH commented that Network Codes places onus on modification proposer to justify retrospection. DH commented that the genesis of #28 came from including retrospection for #22,#23,#24 which resulted in a derogation process which is still ongoing. DH commented that #28 was originally aimed at asking the proposer to justify retrospection as opposed to it being an automatic retrospection.

CER's ROR requested final submissions / views to be submitted from all parties by Friday 8th April in advance of a final CER decision at next DCRP meeting on the 7th June.

5. Update on Distribution Code Modifications:

CER Approved

ROR advised that the following Modification Proposals have been approved by CER

- #37 – 'Bumpless Transfer'
- #38 – Maintenance
- #39 – Management Procedures

KM advised that these are published on the ESNB website with CER approval letter.

Pending CER approval

a) Modification Proposal #34a,b,c,d – Volt Freq FRT for all generators

This modification was submitted to CER for approval following agreement at the previous panel meeting in December 2015.

ROR requested advice as to the intention of the submitted modification with regard to retrospection

SW advised that this mod was previously presented at the last DCRP meeting and submitted to CER by the panel under the assumption that non-retrospection would apply initially.

***Extract from minutes agreed at last DCRP meeting 15th Dec 2016:
"SW advised that DSO did not wish for retrospection to apply"***

"Panel agreed to submit modification to CER for approval. However in addition it was agreed that the issue of retrospection in relation to this modification would be reviewed once SW advised of the quantum impacting the network and CER had made a decision in relation to mod #28"

DC agreed with the technical requirements of the modification; however, also advised that TSO wish for retrospection to apply and was concerned about including in the D Code without retrospection being the default position. Retrospection forces customers to engage with the SOs through derogations – this has not been happening to date and is necessary.

CD and GB advised that if the quantum of generators is small then it may not be a problem and is this retrospection necessary in this case.

PK, GB and CD agreed to engage with customers to ensure engagement with the SOs in this regard.

TH agreed that any decision on retrospection would be informed to a very large degree, by the outcome of ongoing efforts by ESNB and EirGrid, to understand and quantify the risk posed by the residual non-compliant cohort of generators. Work is continuing in this regard but is far from trivial.. TH suggested that once this is complete, a cost-benefit decision can be made by CER as to whether retrospection should apply.

Panel agreed that current submission to CER for approval was sufficient and recommend this modification for approval to CER. In addition, it was also agreed that as suggested by TH, the issue of retrospection in relation to this modification would be reopened and brought to the panel once ESNB/EirGrid conclude their work to quantify the quantum impacting the network

b) Modification Proposal #35 – Power Factor requirements for Type C/D WFPS connections

This modification was submitted to CER for approval following agreement at the previous panel meeting in December 2015.

CD advised of IWEA concerns with regard to the future implications of approving this modification. IWEA concerns relate primarily to cost issues with connection design in the future for future connections and modifications to existing connections.

IWEAs view is that operating at unity should be at request of the SO and not by obligation. IWEA stressed that if requested to operate at unity Power Factor, if the generator can, it will oblige.

TH put on record that he disagreed with IWEAs.

DC explained that TSO had highlighted the benefits to the system of having generators of type C/D operating at unity. It is TSOs understanding that IWEA have no issue with the technical requirements of the modification or the text. The only issue IWEA has is with planning criteria.

PK advised that changing PF requirements may mean that a future connection may need to connect at a higher voltage due to network restrictions. This increases the cost of a connection.

TH stated that the extent of future cases, where a move to a higher connection voltage, would be directly and solely attributable to this modification was being vastly over-stated by IWEA.

CER to review modification submission and make a decision.

c) Modification Proposal #36 – PPM

This modification was submitted to CER for approval following agreement at the previous panel meeting in December 2015.

It was agreed by the panel to discuss this modification as part of the AOB the requirement for solar generation <5MW to be controllable.

6. Proposed Distribution Code Modifications

New Modification Proposals

a) Modification Proposal #40 – Authorised Persons

MOM presented changes to the modification that was proposed at the Dec 2015 meeting to change section DOC 11.4.3 Authorised Persons
At the December meeting, MOM agreed to discuss issues offline with the panel and revert.

Panel accepted changes and agreed to submit to CER for approval

7. Any Other Business / Items for discussion at next meeting

a) Class Derogation

CD advised that he intended to propose a Class Derogation mod which would effectively allow a class of customer to be derogated from a particular section(s) of the Distribution Code. Example: mod impacting hundreds of customers. Instead of each customer applying for a derogation individually and creating a huge workload for both customer and SOs the class derogation would allow a panel member to apply for a derogation on the customers behalf e.g. all wind farms etc.

PK suggested that class derogation would include a list of the customers to be included by the class derogation. PK suggested calling it a Multi Party Derogation.

It was agreed that CD would submit formal modification to the DCRP for discuss at the next DCRP in June 2016.

b) Requirement for solar generation <5MW to be controllable and PPM modification #36

ROR advised that CER had received disputes from customers with regard to TSO RTU requirements for sub 5MW solar generators not being included in the Distribution Code.

DC advised that the ENTSOE Network Code – requirements for generators allows for sub 5MW solar farms to be controllable down to a minimum of 100kW and the current modification #36 includes a threshold of 5MW for controllability.

TH proposed that the modification be submitted for approval as written and that the controllability threshold could be modified at a later date.

LMcM stated that TSO believes that including a threshold of 5MW at this time as per wind implies that sub 5MW solar farms do not need to be controllable which is not correct. TSO analysis has identified that there may be system issues at certain times if more generation that is not visible to, or controllable by, the Control Centres connects. If modification #36 is approved as written now, pending the outcome of modification #28, any solar farms that connects prior to a subsequent modification to the controllability threshold may never have to be controllable or visible.

DC stated that at the moment the only technical option is a TSO RTU but that TSO want to engage further with industry on this issue.

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PK and CD stated the wind and solar industries do not have a problem with being controlled. The issue is with the cost and an approximate cost of €100k for a TSO RTU can be quite expensive for a 1MW plant, for example.

CD requested CER to create a liaison group to investigate other technical solutions to a TSO RTU. DSO(TH) / TSO(LMcM) to discuss offline who from TSO and DSO, should co-convene such a liaison group.

The suggestion was made to withdraw the modification and delete any references to Controllability in the PPM Section TH took an action to look into suggestion and have altered mod ready to bring before next DCRP meeting. At that point, a view can be taken, depending on progress made on the convening and working of the proposed new group, as to whether it is prudent or worthwhile to proceed with the mod #36.

If and when the new groups concludes its findings, the outcome can inform new proposed content of the PPM Section on Controllability in due course.

8. Next Meeting Dates:

- The following dates were proposed for the 2016 meetings of the DCRP:
 - Tuesday 7th June
 - Tuesday 6th September
 - Tuesday 6th December
- Next meeting invite will be issued in the coming weeks

**Keith Moore,
Secretary,
DCRP**

15th April 2016