

## Minutes of Distribution Code Review Panel Meeting – 24<sup>th</sup> March 2015

|                        |                                |   |
|------------------------|--------------------------------|---|
| <b><u>Present:</u></b> | James Brennan (JB)             | Chairman  |
|                        | Keith Moore (KM)               | Secretary   |
|                        | Nigel Morris (NM)              | CER Representative  |
|                        | Tony Hearne (TH)               | DSO Representative  |
|                        | Paul Harrington (PH)           | DSO Representative  |
|                        | David Cashman (DC)             | TSO Representative  |
|                        | Sean Doolin (SD)               | PES Representative/<br>Independent Suppliers Representative |
|                        | Catherine Joyce-O’Caollai (CJ) | Major Customers Representative                              |
|                        | Michael O’Hara (MOH)           | ETCI Representative   |
|                        | Séamus Power (SP)              | EirGrid   |
|                        | Stephen Walsh (SW)             | ESB Networks  |

|                       |                      |                                    |
|-----------------------|----------------------|------------------------------------|
| <b><u>Absent:</u></b> | Ciaran Donnelly (CD) | Embedded Generators Representative |
|-----------------------|----------------------|------------------------------------|

### 1. Review of Previous Minutes

- The minutes of the last DCRP meeting (20<sup>th</sup> January 2015) were accepted by all.

### 2. Membership of the Distribution Code Review Panel

#### a) DSO update

- James Brennan (ESB Networks) formally replaced Derek Hynes as DCRP Chair.
- Keith Moore (ESB Networks) formally replaced Paul Harrington as DCRP Secretary.

#### b) Informal approaches to DSO from other Distribution System Users

- There have been informal approaches to ESNB from other Distribution System Users regarding future membership of the DCRP.

KM provided an update:

- o these approaches are for individual requests to join the DCRP.
- o a letter was sent to these customers following their approach informing them that an individual nomination will not be accepted. The group in question must nominate a person whom they wish to represent them, and then put forward this nomination to the DCRP Secretary via the [DistCodePanel@esb.ie](mailto:DistCodePanel@esb.ie) mailbox. This can be in the form of a letter, which includes the names of the companies, signed by each representative of the company, nominating the said person to represent them on the Distribution Code Review Panel.
- o should a letter of this sort be submitted, as per DGC7.3 of the Distribution Code, it will be presented for consideration at the next DCRP meeting, for review by the panel and may be sent to CER for approval. It was also noted to the customers that all proposals need to be submitted 21 days prior to the next DCRP meeting, for inclusion on the agenda.

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- in the 'general' section of the constitution part 21.5 states that "*All applications for membership of the Panel will be made to the Secretary who will notify the Panel and who will vote at the next Panel meeting to propose or not the application for membership to Commission who will determine if the membership amendment is appropriate and will appoint the new member.*"
- one customer responded to inform that they are currently attempting to make contact with other customers to get agreement on representation.
- issue is how do we vet these customers to ensure they are representing who they say they are and that they continue to represent all members of their group adequately and fairly?
- should the onus be on the requestor?

### **Discussion:**

- DC:
  - There is an issue around appropriate representation of stakeholders at the DCRP. Stakeholders that are impacted by a particular modification must be provided the opportunity to comment on the modification in question. There is currently one representative for all embedded generation however it would be more appropriate to have individual representation for renewable and conventional embedded generators.
  - Stated that the Panel should not be obliged to appoint a member of a particular body like IWEA or Meitheall na Gaoithe. The panel should appoint a person that will represent the interests of the particular stakeholders in an appropriate manner
  - Expressed concern that Modification proposals on the agenda related to generators who may not be represented on the Panel Membership needs to be bottomed out.
- TH:
  - Suggested that requesters wishing to join the panel should attend as observers at the next meeting
- SD:
  - Good idea for the requester to show who they represent and provide proof of this via nomination etc.
  - What categories are represented needs to be discussed
- PH:
  - Should the onus be on the person applying for membership to make the case for how they are currently not represented on the panel.

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### **Conclusion/Actions:**

- Panel agreed that the member appointed to the panel must adequately represent the interests of the stakeholder group in question. A member should not be appointed to solely represent their own interests.
- Panel agreed that the onus should be on requestor to provide reason for joining the panel and proof of whom they are representing and their processes for ensuring that they continue to represent the interests of the group as a whole adequately and fairly in order to join the panel.

### 3. Approval and Publication of Distribution Code (V4.0) and Modifications #31: WFPS Fault Ride Through, #32: WFPS Voltage Regulation, #33: WFPS Voltage Step Change

KM provided an update:

- Distribution Code (V4.0) and Modifications #31: WFPS Fault Ride Through, #32: WFPS Voltage Regulation, #33: WFPS Voltage Step Change have been published on the ESB Networks website
  - o Distribution Code version 4.0  
[http://www.esb.ie/esbnetworks/en/about-us/our\\_networks/distribution\\_code.jsp](http://www.esb.ie/esbnetworks/en/about-us/our_networks/distribution_code.jsp)
  - o Modifications  
[http://www.esb.ie/esbnetworks/en/about-us/our\\_networks/distribution\\_code\\_modifications.jsp](http://www.esb.ie/esbnetworks/en/about-us/our_networks/distribution_code_modifications.jsp)

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

- KM provided an update:
  - 202 derogation applications received since March 2014.
  - Approximately 61 assessments pending submission CER.

### 5. CER update on Distribution Code Modification Proposal #28 (Distribution Code Modification Implementation Process)

- NM provided an update:
  - CER's analysis of this modification proposal is on-going.
  - CER hope to have a decision on this for the next meeting of the DCRP.

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### 6. Proposed Distribution Code Modifications

#### a) Modification Proposal #34 – Volt Freq FRT for all generators

- SW presented slides on the proposed modification – circulated to members after the panel meeting

#### **Discussion:**

- SW
  - stated that there were a few tweaks required to the text in the modification and the modification will be presented for approval at the next DCRP
- MOH
  - voiced concerns regarding the impact this change may have on hospitals and suggested that the HSE be made aware.
  - hospitals are obliged by law to test their backup generators on the system for a couple of hours every week
  - concerned that there was no generator representation at the meeting (Generator Representative did not attend)
  - who represents the HSE?
- SW
  - The same rules would apply to these generators if they are run in parallel with the system
- DC
  - retrospection should be assumed and is required
  - had reservations about approving the modification without appropriate embedded generation representation on the Panel.
- SW
  - derogations would be required for a significant number of customers if retrospection is applied
- TH
  - Questioned the efficiency of the derogation process in this instance – perhaps another option would be better
- JB
  - Suggested a subgroup be setup to examine what representation is on the panel and if additional representation is required
- DC
  - The Panel should endeavour to have appropriate representation in place for the next meeting so that appropriate discussion can take place.

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### **Conclusion/Actions:**

- Panel agreed that it shall not approve this generator mod without generator representative input.
  - Panel agreed that a subgroup should be setup to address the issue of the representation of the impacted cohort of generators.
  - Subgroup to address the following points:
    - Review the membership request to determine whether the particular party has right to attend the next DCRP meeting under article 5.2 and 21.5 of the DCRP Constitution.
    - Determine whether the existing Panel membership list as per section 5.1(i) of the constitution is adequate or if a modification is required to expand the membership.
- b) Modification Proposal #35 – Power Factor requirements for Type C and Type D WFPS connections
- SP presented the modification to the panel for approval.

### **Discussion:**

- SP
  - studies have been done in EirGrid that show that there are significant benefits to operating closer to unity
  - the ability to operate at unity can significantly reduce the reactive compensation requirements on the system and has an overall system-wide benefit
  - stated that this needs to be applied retrospectively to get real benefit
- KM/TH/JB
  - voiced concerns regarding the number of studies that may be required if retrospection is applied
  - Operating at unity will likely have network impacts in terms of voltage rise
  - assuming retrospection would result in a number of derogations being required
- SP
  - stated that this modification was with respect to generator capability. The actual power factor set-points of the wind farms may be limited by the capability of the connection, e.g. a wind farm may be operated at a maximum of 0.97 leading power factor so as to prevent high voltages
  - stated that there was already 713 MW of Type C and D connected so not applying this retrospectively would affect a large proportion
- Panel
  - It was noted in a previous discussion that representation of generators was not present at the meeting and the panel advised its concern regarding approval of a mod without the relevant impacting party present.

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- DC
  - emphasised the urgency of approving this modification in relation to Capital Approvals pending approval
  - requested that approval be sought at this DCRP meeting and a subgroup setup later to discuss with generator representative and
  - if they were in agreement, mod could be considered approved
- SD
  - requested that any subgroup feedback should be brought back to the panel for further discussion first.
  - any arguments should be voiced to the panel for consideration before determining status.
- TH
  - voiced concerns regarding Type D inclusion and would rather limit to 38kV
- SP
  - stated again that the modification was about wind farm capability. Network considerations will determine set points.
  - ESBN have done some studies already for urgency reasons in relation to projects pending capital approval e.g. Ikerrin
  - if Type C or D connected customers cannot comply then EirGrid would support a derogation to the capacity of the connection e.g. if the connection can only take up to 0.98 leading then EirGrid would support a derogation to 0.98 leading.
- JB
  - suggested a subgroup be setup to consult generator representative re. wind farm implications

### **Conclusion/Actions:**

- The Panel agreed that we cannot approve without generator representative input and that a subgroup be setup.
- Subgroup to consider the following issues before the mod proposal is brought back before the DCRP for approval.
  - Generators capability to comply with the modification
  - Network impacts

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### 7. Addressing different generation technology types in the Distribution Code

- Tony Hearne proposed a mod to include Power Park Module

#### **Discussion:**

- TH
  - Object is to categorise PV the same as wind and how it is presented to the SOs on the system
  - Nothing relates to PV in the Code
  - 2 options proposed
  - Do we think this the right thing to do?
  - Non-GPA allows PV currently – some application received are 20-30MWs in size – should these be considered Gate?
- DC
  - EirGrid support as long as this takes in the broader picture i.e. other energies such as wave etc.
  - Perhaps we could state at the beginning of DCC11 that this applies to Wind and PMM.

#### **Conclusion/Actions:**

TH to work up a more formal mod and present at the next DCRP meeting

### 8. Any Other Business / Items for discussion at next meeting

#### **a) Modification #30: Windfarms less than 5 MW – fault ride through**

- JB
  - Gave an update on the progress of the two subgroup meetings since the last DCRP meeting.
  - Mod proposal is currently on hold pending direction from CER on the treatment of generators already connected to the system and who are unable to comply with the FRT requirement.
- DC:
  - Expressed reservations about the proposal for a class derogation or exemption letter
  - highlighted the need for a clear mod process and the approval by CER of modification #28.
- TH:
  - There is a need for a method to handle issues of retrospection that arise in this mod and other that are before the panel. Upcoming European Network Codes have a method to deal with retrospection
- NM:
  - If there are good reasons for a class derogation then it can be a more efficient method to deal with derogation requests

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### **b) Proposed Housekeeping**

- KM proposed some changes to some text in the D Code that requires clarity and tidy-up.
- KM to propose a modification with collective changes at next DCRP meeting.

### 9. Next Meeting Dates:

- The following dates were proposed for the 2015 meetings of the DCRP:
  - Meeting 1: Tuesday 24<sup>th</sup> March
  - Meeting 2: Tuesday 9<sup>th</sup> June
  - Meeting 3: Tuesday 8<sup>th</sup> September
  - Meeting 4: Tuesday 1<sup>st</sup> December

**Keith Moore,  
Secretary**

13<sup>th</sup> April 2015 (review of minutes issued on 30<sup>th</sup> March 2015)