

DISTRIBUTION CODE MODIFICATION PROPOSAL FORM

Modification Proposal submitted By:	DATE OF SUBMISSION OF PROPOSAL:	Modification Proposal Number: <i>(to be assigned by Review Panel Secretary)</i>
Tony Hearne	08/12/2021	#58

CONTACT DETAILS FOR MODIFICATION PROPOSAL ORIGINATOR: (IF NOT DISTRIBUTION CODE REVIEW PANEL

NAME: Tony Hearne	TELEPHONE NUMBER: 087 2238855
E-MAIL ADDRESS:	tony.hearne@esb.ie
MODIFICATION PROPOSAL TITLE:	Permanent Decommissioning of Generation Units, and the introduction of the term Power Generation Facility Owner (PGFO) in DOC12

DISTRIBUTION CODE SECTION(S) AFFECTED BY PROPOSAL

1. DOC 12

MODIFICATION PROPOSAL DESCRIPTION *(Clearly state the desired amendment and all text changes. Attach further information if necessary)*

1. Include requirement for a Power Generation Facility Owner [PGFO] to inform DSO in the case of the permanent decommissioning of a Generation Unit

The requirement for a generator owner to inform the relevant system operator of the permanent decommissioning of a power generating module is included in EU NC2016/631 RfG. See Art 30(3) for Type A, and Art 32 (4) for Type B and Type C. 'The power-generating facility owner shall ensure that the relevant system operator or the competent authority of the Member State is notified about the permanent decommissioning of a power-generating module in accordance with national legislation.'

RfG does not have an explicit requirement regarding permanent decommissioning of Type D units, but a requirement is already included in the Grid Code under PC4.5. It is important that the permanent decommissioning of generation units of this size (10MW and above) would be notified to the DSO.

The new wording, in red, will be as follows:

DOC12.4 PERMANENT DECOMMISSIONING

The PGFO of a Type A, B C or D Generator shall inform the DSO in the case of the permanent decommissioning of a Generation Unit. The Notification shall be made as soon as practicable, but in any event, no later than 3 months following the de-commissioning.

2. At the same time as this requirement is being added to DOC12, the opportunity is being taken to standardise the wording in DOC 12 regarding the owner of the generator. Where it is the generator owner that is being referenced, the term PGFO will be used instead of Generator. This will require the following changes – shown in blue.:

DOC 12	DISTRIBUTION OPERATING CODE – GENERATOR OPERATIONAL NOTIFICATION PROCESS
DOC12.1	INTRODUCTION
DOC12.1.1	Distribution Operating Code 12 (DOC12), describes the high level processes that ultimately leads to the issuance of various forms of Operational Notifications, to the Generator Power Generating Facility Owner (PGFO) by the DSO, as mandated by the Requirements for Generators [RfG] EU Network Code.

.....

DOC12.3	OPERATIONAL NOTIFICATION PROCEDURES
DOC12.3.1	The Generator-PGFO shall demonstrate to the DSO that it has complied with Generation Unit requirements by successfully completing the Operational Notification Procedure for connection of each Generation Unit.
DOC12.3.2	<p>Operational Notification Procedure</p> <p>The Operational Notification Procedure for connection of each Generation Unit can involve combinations of the following:</p> <ul style="list-style-type: none"> • Where applicable issuance by the DSO of a PGMD to the Generator-PGFO; • Where applicable, issuance by the TSO, of an Operational Notification Justification [ONJ] to the DSO; • Energisation Operational Notification (EON); • Interim Operational Notification (ION); and • Final Operational Notification (FON).
DOC12.3.3	<p>Energisation Operational Notification [EON]</p> <p>If all the necessary conditions are fulfilled, the DSO shall issue an EON to the Generator-PGFO. Upon receipt of the EON, a Generator-PGFO may energise its internal network and auxiliaries for the associated Generation Unit by using the grid connection that is specified for the Connection Point.</p>
DOC12.3.4	<p>Interim Operational Notification [ION]</p> <p>If all the necessary conditions are fulfilled, the DSO shall issue an ION to the Generator-PGFO. Upon receipt of the ION, a Generator-PGFO may operate the associated Generation Unit and generate power for a limited period of time, by using the grid connection that is specified for the Connection Point. The limited period of time shall be agreed with the TSO or DSO as appropriate and shall not be longer than 24 months. An extension to this period of time may be granted via a derogation undertaken according to DGC12, if the Generator-PGFO can demonstrate sufficient progress towards full compliance and outstanding issues are clearly identified.</p>
DOC12.3.5	<p>Note on practical implementation by the DSO, of EONs and IONs</p> <p>Issuance by the DSO, of an Approved Version of the Energisation Instruction [EI] to the Customer or their appointed agents, constitutes the means through which the Customer is notified that, at the appropriate step therein, it is in order to connect their plant to the Distribution System for the first time. It thus constitutes an Energisation Operational Notification [EON].</p> <p>It also constitutes the means through which, when successful energisation has been achieved through the execution of the EI, the Power Generating Module [PGM], may use the grid connection for a period of time no greater than one year from the date of issuance of an approved version of the EI, to initiate compliance tests to ensure compliance with the relevant specifications and requirements of the Distribution Code. This may involve the exporting of power up to limits prescribed by other processes but in any event no greater than the MEC. It thus also constitutes an Interim Operational Notification [ION].</p>
DOC12.3.6	<p>Final Operational Notification [FON]</p> <p>If all the necessary conditions are fulfilled, including where controllability by the TSO applies, the issuance of a ONJ by the TSO to the DSO, the DSO shall issue a FON to the Generator-PGFO. Upon receipt of the FON, a Generator-PGFO may operate the associated Generation Unit and generate power by using the grid connection that is specified for the Connection Point.</p> <p>If the DSO identifies a reason not to issue a FON, the Generator-PGFO may seek a derogation via the process described in DGC12. Where a request for a derogation is rejected, the DSO shall have the right to refuse to allow the operation of the Generation Unit until the Generator-PGFO and the DSO resolve the incompatibility and the DSO considers that the Generation Unit is compliant with Distribution Code.</p> <p>If the DSO and the Generator-PGFO do not resolve the incompatibility within a reasonable time frame, but, in any case not later than 6 months after the notification of the rejection of the request for a derogation, each party may refer the issue for decision to the CRU.</p>
<p>MODIFICATION PROPOSAL JUSTIFICATION <i>(Clearly state the reason for the modification. Attach further information if necessary)</i></p>	
<p>RfG requires the PGFO to inform the DSO of the permanent decommissioning of a Type A, B or C PGM. It is considered appropriate that the requirement is extend to Type D PGMs also.</p> <p>There is a noncompliance on the ACER report on implementation of Network Codes in relation to the this provision of Type A specifically. It has been agreed with CRU that this would be addressed by inserting appropriate text in the D-code.</p>	

IMPLICATIONS OF NOT IMPLEMENTING THIS MODIFICATION

ESB Networks as DSO, would not be complying with RfG requirements.

PLEASE SUBMIT MODIFICATION PROPOSALS TO THE PANEL SECRETARY BY E-MAIL TO: DISTCODEPANEL@MAIL.ESB.IE