

**TYNAGH ENERGY  
L I M I T E D**

EirGrid  
The Oval  
160 Shelbourne Road  
Ballsbridge  
Dublin 4

Ref: TEL/PH/16/182

30<sup>th</sup> November 2016

**RE: Proposed Grid Code Modification required for I-SEM.**

Dear Sirs,

Tynagh Energy Limited (TEL) welcomes the opportunity to respond to the Proposed Grid Code Modification required for I-SEM consultation paper.

TEL would like to take this opportunity to raise our concerns over the Grid Code Requirement for a three year termination notice of plant closure. In the CRM Locational Issues paper (SEM-16-052) the SEM Committee (SEMC) requested feedback on "*whether it is appropriate to provide assurances that generators which do not win a Reliability Option (RO) in the transitional auctions be released from their obligations to give three years notice in accordance with the Grid Code*". The emerging thinking from the CRM Locational Issues Consultation<sup>1</sup> is that the "*SEMC will have appropriate regards to statutory duties and where no local security of supply issues, request for derogation would be sympathetically received but it is not purely a CRM issue*".

Further clarity is required on this extremely important issue. TEL believes that if a participant does not receive a RO and is therefore unable to recover their fixed costs, they should not be mandated to a three year notice period. TEL believe that a modification to the Grid Code is needed and that the notice period should be in line with the CRM auction process.

**Questions**

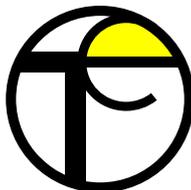
*Consultation Question 1 - Does the proposed modification to Grid Code sections SDC1, SDC2, OC8 and the glossary adequately and accurately give effect to the I-SEM arrangements?*

TEL agrees the proposed modifications to the Grid Code sections adequately give effect to the I-SEM arrangements. However, TEL believes further clarification is required on two items, Ancillary Services definition and the new dispatch instruction.

Section SDC2.4.2.3 highlights the scope of dispatch instructions and makes reference to Ancillary Services. TEL believes the definition of Ancillary Service should be updated to include all of the DS3 System Services.

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<sup>1</sup> I-SEM CRM Local Issues - Emerging Thinking, Dundalk, 9<sup>th</sup> November 2016.



TEL does not agree with the addition that *“the TSO may, however, at its discretion, specify a time beyond the end of the trading days for which gate closure 1 has passed”*. This new sentence is ambiguous and needs further clarification in terms of how far the instruction can last and the commercial implications (i.e. what bids will be applied). This addition could have cost recovery and bidding implications for each participant if default COD is used by the TSO prior to the submission of new COD.

*Consultation Question 2 - If not, in what way does the proposed modification fail to adequately and accurately support the I-SEM arrangements?*

N/A.

In summary, TEL agrees with the proposed modifications to the Grid Code but we would require greater clarification on the new dispatch instruction. This clarification will improve the transparency that is currently available in the SEM. I trust that these comments will prove helpful and should you have any queries, please do not hesitate to contact me.

Yours sincerely,

**Paraic Higgins**  
**I-SEM Analyst**