



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

Robert O'Rourke  
Commission for Energy Regulation  
The Exchange  
Belgard Square North  
Tallaght  
Dublin 24

REF: TEL/DV/13/142

9<sup>th</sup> August 2013

**Re: Rate of Change of Frequency Modification to the Grid Code**

Dear Robert,

Tynagh Energy Limited (TEL) welcomes the opportunity to respond to the consultation paper on the Rate of Change of Frequency (ROCOF) Modification to the Grid Code (CER/13/143) that was published on the 28<sup>th</sup> June 2013. TEL would like to make comments under the following headings:

1. Approval in Principle
2. Definition of RoCoF Standard
3. 18 Month Timeline
4. Programme Governance
5. Cost Recovery
6. RoCoF GPI
7. Alternative Solution

**1. Approval in Principle**

TEL supports the achievement of the Government's target of 40% of electricity generation from renewable energy by 2020. TEL acknowledges that, in order to meet this target, it will be necessary to raise the system non-synchronous penetration (SNSP) limit to 75%. In order to manage the system securely with such a high level of non-synchronous generation the TSO has identified additional system services that will be required from all generators and proposes to deliver these services through the DS3 programme. Underpinning this is the assumption that the rate of change of frequency (RoCoF) standard can be raised to 1Hz/s measured over 500ms.

There is considerable technical uncertainty as to whether conventional generation units are capable of complying with the increased standard. There have been a relatively small number of events which have resulted in a RoCoF in excess of the current standard of 0.5 Hz/s in Ireland and Northern Ireland, and there is no prior international experience on which to base an assessment.

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**The Crescent Building, Northwood Park, Santry  
Dublin 9  
IRELAND**  
**TEL:** +353 (0) 1 857 8700  
**FAX:** +353 (0) 1 857 8701

**DIRECTORS**  
Mr Gerald Friel (USA), Mr John Cote (USA)  
Mr Bran Keogh (IRE), Mr Diarmuid Hyde (IRE)  
Mr Arif Ozozan (TR)  
**REGISTERED NUMBER:** 378735

