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## **Joint IWEA/NIRIG response to NIE Networks Generator Interface Protection Amendment Project, Distribution Code Consultation Document**

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The Northern Ireland Renewables Industry Group (NIRIG) represents the views of the renewable electricity industry in Northern Ireland, providing a conduit for knowledge exchange, policy development, support and consensus on best practice between all stakeholders. Committed to making a positive difference, we promote responsible development, support good community engagement and deliver low-cost electricity generation from sources such as onshore wind, tidal, solar and storage using our greatest natural resources.

The Irish Wind Energy Association (IWEA) is committed to the promotion and education of wind energy issues and plays a leading role in the areas of conference organisation, lobbying and policy development on the island of Ireland. IWEA is committed to promoting the use of wind energy in Ireland and beyond as an economically viable and environmentally sound alternative to thermal or nuclear generation.

IWEA and NIRIG welcome the opportunity to respond to NIE's consultation on ROCOF changes in the Distribution Code. DS3 is a critical programme to the renewable industry and to Northern Ireland achieving the 40% 2020 renewable targets and beyond. Changing ROCOF settings were identified at an early stage as a significant milestone to increasing SNSP limits

to 75%. We are fully supportive of initiatives to implement the changes that will enable increased SNSP limits.

We welcome the consultation proposals to change the ROCOF settings for generators >5MW. We request that the changes to NIE distribution code and changes in generators protection systems are completed as soon as possible and by the end of 2017 at the latest as proposed in the NIE documents.

We are very concerned that the ROCOF settings for generators <5MW will not be changed. This could have a substantial impact on the Northern Ireland renewable industry, and a key concern is that this substantial impact has not been defined within the consultation. It is noted that the incremental risk between the different setting appears to be relatively small and that the risk remains within the 'tolerable' band.

In the Costs and Benefit section it is shown that there is a substantial benefit to the consumer in lower SEM costs from increasing the ROCOF settings and therefore the SNSP limits. What is very concerning is that the impact on SNSP limits of this decision is not detailed in the NIE consultation documents. It is not clear if this decision will result in the SNSP limit not being increased further. We would request that there is further dialogue and analysis between NIE and the Transmission System Operators on the impact of not changing the SNSP limits. We would also request that further analysis is completed by NIE and their consultants on potential mitigation measures.

In summary, NIRIG and IWEA request the decision to increase ROCOF settings for >5MW is approved and implemented as soon as possible. We would request that the complexity of the SSG decision should not delay the approval of the LSG decision. We have major concerns on the proposals to not increase the ROCOF settings for <5MW generation. We request that NIE, the System Operators, the Regulators and the SEM committee have further dialogue on the SSG issue.

IWEA and NIRIG would like to thank NIE Networks for the opportunity to respond to this consultation on Distribution Code for the Generator Interface Protection Amendment Project. If you would like to discuss further please do not hesitate to contact us: we are available to meet NIE or any other DS3 stakeholder to discuss further the NIE consultation and the comments above.

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