

**IWEA submission on the Proposal for Rate of Change of Frequency Remuneration Mechanism
Consultation**

08 February 2016

IWEA welcomes the opportunity to respond to consultation on the Proposal for Rate of Change of Frequency Remuneration Mechanism.

IWEA's overriding objective with the DS3 arrangements is that they must deliver the necessary changes to facilitate the achievement of the 2020 renewable targets and minimise curtailment. The delays that have been seen to date in increasing the System Non-Synchronous Penetration (SNSP) on the electricity system are of serious concern to the wind industry, and wind generators are likely to see increasing levels of curtailment if the DS3 programme is not progressed in a timely manner, thereby putting the 2020 renewable energy targets at risk.

The RoCoF workstream is a fundamental component of the DS3 programme. While the wind industry has concerns in relation to the time involved in implementing the RoCoF Grid Code changes, it is essential that changes are made in a safe and secure manner. We welcome the proposals within this consultation which incentivise early delivery of RoCoF technical studies and capability.

IWEA has previously outlined why we believe that some element of cost recovery may be appropriate in relation to the introduction of the RoCoF Grid Code Modification¹. The proposals outlined in this consultation paper allow for some cost recovery, while at the same time incentivising early delivery. IWEA welcomes this proposal as it delivers the associated benefits to the consumer and to wind generators earlier than would otherwise be the case, introducing efficiencies where possible.

¹ <http://www.iwea.com/index.cfm/page/iweapolicydocuments?twfid=1334&download=true>