



IWEA response to the ACER Consultation on the Framework Guidelines on System Operation

15 September 2011

The Irish Wind Energy Association (IWEA) welcomes the opportunity to respond to the ACER Consultation on the Framework Guidelines on System Operation. IWEA is Ireland's leading renewable energy representative body and represents interests in onshore and offshore wind energy in Ireland and Northern Ireland.

IWEA welcomes the objective outlined in the document of "Facilitating the targets for integration of variable and distributed (renewable and other) generation". IWEA believes the inclusion of this objective is important to enable the widespread development of renewable generation.

General System Operation Characteristics

IWEA welcomes the inclusion of the following criteria under general system operation characteristics. This ensures that any excessive Network Code requirements have to be justified using a cost-benefit analysis, thereby creating a more level playing field for generators in different jurisdictions.

"System Operation requirements shall:

- Be evaluated and defined in terms of technical needs and cost/benefit and related organisational provisions.
- Consider market needs.

Where the minimum standards and requirements, introduced by the Network Codes deviate significantly (e.g in terms of cost- and riskallocation) from the current international standards, procedures and requirements, there should be a cost/benefit analysis on the one hand that justifies this deviation and on the other hand demonstrates additional benefits from requiring the new standard. This could be elaborated in an impact assessment document, accompanying the respective Network Codes."

Topic 3: Load-Frequency-Control

IWEA notes that Ireland is an island synchronous system and is not subject to the requirement to coordinate with other transmission systems in relation to load-frequency control. However, as a general principal we welcome the comment "The application of minimum standards and requirements to *significant grid users* predating Network Codes implementation should be defined in terms of both

cost/benefit and organisational analysis” as this affords protection to wind farms that connected before the grid code was introduced.

IWEA would like to raise the following concerns in relation to the Framework Guidelines:

Priority Dispatch

According to European Directive 2009/28/EC producers using renewable energy sources have priority access to the grid and system operators will give priority dispatch to RES generators. In order to ensure consistency with these provisions IWEA requests that this Directive is referenced in the FG SO. It is not clear how Priority Dispatch is to be dealt with by system operators with respect to the European Target Market, and in particular in relation to the operation of interconnectors. For example, will priority dispatch be applicable to electricity exports? This is an issue of particular interest in Ireland due to the high levels of wind penetration currently on the Irish electricity system, with higher levels anticipated in coming years to meet our 2020 obligations and potentially contributing to other member states meeting their targets as envisaged under the flexibility mechanisms of the Directive.

In view of these legal requirements in the RES Directive IWEA urges ACER and ENTSO-E to proceed with electricity market integration on a basis that does not jeopardise the deployment of RES necessary to deliver Europe’s agreed decarbonisation objectives.

General Comments

IWEA would also like to highlight the importance of engaging with the various stakeholders in all member states in relation to the development of the target model. It appears that a lot of decisions in relation to the direction of the market have already been made without significant levels of consultation. While we recognize that ACER is made up of the regulators from the different member states, it is important that all the work is being carried out under a policy framework, and that a fully coordinated approach is being followed.

IWEA welcomes the opportunity to respond to the consultation and looks forward to engaging further as this process develops.