



TSO response to SEM Committee request for a
recommendation on SEM-12-076

February 2013

Summary

The responses to the Constraint Group consultation were passed on to the TSOs by the Regulatory Authorities to help them interpret the issues raised and to check that none of the issues raised affected the modelling behind the constraint group proposals. The issues that were relevant to the constraint group consultation are addressed later in this document. Some of the issues raised were not within the scope of this constraint group consultation and are not addressed.

Having reviewed the responses the TSOs have concluded that in so far as we have understood and modelled the principles and criteria relating to constraint groups as set out in SEM-11-105, which we believe we have and which has not itself been questioned by either the SEM Committee or the respondents, that none of the issues raised in this consultation would indicate that there are any fundamental issues with the modelling exercise used to develop the constraint group proposals. The TSOs assume that our interpretations are in line with the SEM Committee's given that the proposals were published without further comment by the SEM Committee.

Issues raised

The issues that were raised that were relevant to the proposals on constraint groups are addressed below.

It is proposed in SEM-12-076 to have 2 constraint groups in Ireland (one in Donegal at present and a further one materialising in the Southwest when the 220kV stations are built) and no constraint group in Northern Ireland. One response sought confirmation that no new constraint groups will be identified at a later date. SEM-11-105 states that *"the SEMC has decided to fix the maximum size of the constraint groups [...] in Year 1"*. Generators will "fall out" of the groups as the transmission network is developed. Given that the modelling did not find a case for a constraint group in Northern Ireland, the TSOs would interpret this to mean that a constraint group in Northern Ireland is not expected to be instigated in the future since *"...constraint group boundaries will be established in Year 1 and will only reduce in subsequent years"*.

Several respondents wanted to know how constraints outside of constraint groups will be handled. SEM-11-105 states that in such cases *"...the TSOs will dispatch down wind generation units in a manner that best relieves the constraint, whilst minimising the dispatching down of wind"*. The TSOs propose to publish an implementation policy covering how the dispatch rules defined by the SEM Committee in SEM-11-062, SEM-11-105 and for curtailment will be implemented in operations.

The rationale for not including maintenance outages in the investigation of potential constraint groups was questioned. Constraint groups are an approximation of the SEM Committee's intention to be reflective of access rights in dispatch during times of constraint. One of the criteria defined in SEM-11-105 for establishing these groups was that it would be on an enduring basis and shrink in size as transmission development was completed. While constraints during periods of maintenance can be higher than non-maintenance periods, this is not on an enduring basis. The objective of the modelling exercise was to propose groups that satisfied the SEM Committee's criteria as opposed to identifying the exact level of constraints. On this basis, maintenance should not be considered in formulating the groups because it does not endure. Using the same rationale, a double-circuit contingency is a continuous factor that influences dispatch and therefore is appropriate to use for investigating constraint groups.

Some respondents requested the assumptions used for the grid roll-out used in the studies. The grid delivery timelines for Ireland and Northern Ireland were assumed to be in line with the All Island Transmission Forecast Statement 2012-2018.

A question was raised as to whether the offshore wind developments in Northern Ireland were taken into account. It was assumed that the majority of the Northern Ireland offshore wind did not connect in advance of the second North-South tie-line being commissioned. The expected impact of offshore generation on transmission constraints was modelled in this light.

Respondents requested that each windfarm in the constraint group be named. The proposed constraint groups arising from SEM-11-105 report gives the nodes that are in the proposed constraint groups and all windfarms connected at those nodes will be in the constraint group.

Conclusion

The TSOs are happy to have the opportunity to provide commentary on relevant issues raised by respondents to SEM-12-076. Overall it was noted that there was broad acceptance of the constraint group concept and the means by which they had been modelled by respondents. Whilst there were a number of issues raised in the responses, none of them gave rise to a fundamental re-think by the TSOs on how the modelling exercise was carried out. Other issues not specific to the constraint group consultation were also raised by respondents but are not addressed by the TSOs in this document.

It should be noted that the Gate 3 constraint reports in Ireland are contingent on a final approved constraint group being published by the SEM Committee. A timely decision on these proposals will facilitate the preparatory work for the Gate 3 constraint models and therefore help the delivery of Gate 3 constraint reports to customers.

The TSOs will be happy to assist the SEM Committee in any further queries that may arise.