



www.EirGrid.com
The Oval, 160 Shelbourne Road,
Ballsbridge, Dublin 4, D04 FW28,
Ireland
T +353 1 677 1700
E info@EirGrid.com



www.soni.ltd.uk
Castlreagh House,
12 Manse Road, Belfast
BT69RT
T+ +44 28 907 94336
E+ info@soni.ltd.uk

John Melvin
Commission for Regulation of Utilities
The Exchange
Belgard Square North
Tallaght
Dublin 24

Colin Broomfield
Utility Regulator
Queens House
14 Queen Street
Belfast
BT1 6ED

16th January 2024

RE: Scheduling and Dispatch Programme Priority Dispatch Hierarchy Request

Dear John and Colin,

EirGrid and SONI (“the TSOs”) are writing to the SEM Committee with a request to issue an amendment to the Priority Dispatch Hierarchy.

The current hierarchy as set out in SEM-11-062 is as follows:

1. Re-dispatch of conventional generation and SO counter trading on the interconnector after Gate Closure;
2. Peat Stations
3. Hybrid Plant
4. High Efficiency CHP/Biomass/Hydro
5. Solar/Tidal/ Windfarms, and within windfarms
 - i. windfarms which should be controllable but do not provide this;
 - ii. windfarms which are controllable;
 - iii. windfarms which are exempted or are not expected to be controllable
6. Interconnector re-dispatch;
7. Generation, the dispatch down of which results in a safety issue to people arising from the operation of hydro generation stations in flooding situations.

Solar and Tidal generation were not included in the 2011 Decision Paper but were subsequently included in the hierarchy by the TSOs pursuant to a letter from the SEM Committee on 24 March 2017 which confirmed that they could be entered onto the priority dispatch hierarchy in the same position as wind generation, without prejudice to the outcome of any consultation reviewing the wider priority dispatch hierarchy.

All wind and solar generators are currently included under point 5 of the hierarchy above, indicating Priority Dispatch status. However, under Article 12 of the Clean Energy Package Regulation (EU) 2019/943 and subsequent decision SEM-20-072, many wind and solar generator units will now not be eligible for priority dispatch status. This will include units that:

1. Were not commissioned or did not have contracts concluded before 4th July 2019,
2. Underwent significant modifications since 4th July 2019, or
3. Relinquished their Priority Dispatch status.

The exact details of these conditions are set out in SEM-20-072.

The Scheduling and Dispatch Programme is working to deliver market and system changes to allow controllable wind and solar units to participate in the balancing market without priority dispatch status as required under the Clean Energy Package Regulation 943 Article 12 and SEM-21-027.

We suggest amending the hierarchy for non-priority dispatch wind and solar generators in the same manner as was done for solar and tidal generators in 2017 without prejudice to the outcome of a wider review. We propose adding wind and solar generators without priority dispatch status under the terms of SEM-20-072 to point 1 in the hierarchy above and excluding them from point 5, resulting in the updated hierarchy below:

1. Re-dispatch of conventional generation and wind and solar units without priority dispatch status under the terms of SEM-20-072, and SO counter trading on the interconnector after Gate Closure;
2. Peat Stations
3. Hybrid Plant
4. High Efficiency CHP/Biomass/Hydro
5. Solar/Tidal/ Windfarms with priority dispatch under the terms of SEM-20-072, and within which the following order applies:
 - i. units which should be controllable but do not provide this;
 - ii. units which are controllable;
 - iii. units which are exempted or are not expected to be controllable
6. Interconnector re-dispatch;
7. Generation, the dispatch down of which results in a safety issue to people arising from the operation of hydro generation stations in flooding situations.

The above hierarchy applies to dispatch only, i.e. the dispatch of units to meet the energy requirements of the market, as defined in SEM-21-026¹. It does not apply to non-market based redispatch of renewables, i.e. the pro-rata constraint and curtailment of wind and

¹ "In the SEM, dispatch relates to the scheduling and dispatch of units to meet the energy requirements of the market"



solar generators. This will continue to be carried out without regard to priority dispatch status and only where other solutions would result in significantly disproportionate costs or severe risks to network security, as set out in the Clean Energy Package Regulation 943 Article 13(6).

The TSOs request that the SEM Committee consider the proposal above with the aim of updating the Priority Dispatch principles to include non-priority dispatch wind and solar generation in line with EU regulation and SEM Committee decisions. The TSOs' view is that this is a straightforward and necessary update which can be completed in advance of a wider review of the Priority Dispatch Hierarchy to allow for the delivery of Scheduling and Dispatch Initiative 1 (SDP_01): The Treatment of Non-Priority Dispatch Renewables.

We are available to meet with you to discuss this proposal further as required.

Yours Sincerely,
[no signature required -sent by email]

Errol Close
Head of Group Regulation
EirGrid plc

Kevin O'Neill
Head of NI Commercial & Regulation
SONI Ltd