Process for the Calculation of Outturn Availability

Decision Paper

29 September 2015

SEM-15-071

CONTENTS

1 EXECUTIVE SUMMARY

On 23 February 2015, the RAs published a Minded to Decision paper on the calculation of Outturn Availability in the Single Electricity Market ("SEM")[1]. Eleven responses to this paper were received and are published alongside this decision. Having considered these responses, this SEM Committee ("SEMC") decision paper endorses the following:

- Outturn Availability is not adequately defined in the Trading and Settlement Code ("TSC")[2] and is not defined in the Grid Codes[3]. The SEMC requires that the Transmission System Operators ("TSOs") bring forward a modification, commensurate with this decision paper, to the next Grid Code Review Panel and Modifications Committee meeting, following the publication of this decision paper.
- No changes will be made to the current arrangements for the calculation of Outturn Availability for generators connected at the "legacy" position in Northern Ireland. Generators connected at the "legacy" position are deemed Outturn Available if there is an outage of the connection asset in all cases (i.e. for fault repair or maintenance).
- For Northern Ireland generators, connected at the "new" position, the SEMC have concluded that generators will be considered Outturn Available for all connection asset outages with the exception of annual maintenance outages lasting up to and including five calendar days.
- For ROI, the SEMC require that generators be considered Outturn Available for all connection asset outages with the exception of annual maintenance outages lasting up to and including five calendar days.
- The TSOs are to establish a forum which will be responsible for:
  - The publication of separate annual maintenance schedules for NI and ROI
  - The publication of separate ex-post summaries for NI and ROI
  - Sending these documents to the RAs for review
- A generator with a temporary connection asset should have its Outturn Availability set to zero for all outages caused by their own construction works. Any other transmission outages affecting the generators on temporary connection which are not driven by the

[1] SEM-15-014 – SEMOC Outturn Availability – Minded to decision paper, dated 23 February 2015

[2] http://www.sem-o.com/MarketDevelopment/MarketRules/TSC.docx

[3] http://www.soni.ltd.uk/media/documents/Operations/Grid-Code/SONI%20Grid%20Code%20Version%20Aug%202015.pdf and http://www.eirgrid.com/media/GridCodeVersion6.pdf

generator's own construction works will be subject, as normal, to the final process for the calculation of Outturn Availability.

- In relation to extensions to or changes at existing connections, where work is being carried out that is related to an existing generator, Outturn Availability will equal zero. However, where work is being carried out to another generator (with a different connection point but a shared asset) then Outturn Availability will equal that of the generator's Technical Availability.
- The SEMC requires that maintenance of connection assets should only mean the maintenance of a generators shallow connection assets and not maintenance to any deep reinforcements.
- In relation to the issue of shared connection assets, and who the outage will apply to within the group of generators sharing the connection assets, the SEMC endorses the position that any scheduled outage will apply to all the generators using the connection asset. Any maintenance caused by a particular generator's own construction works will lead to that generator being declared Outturn unavailable but the other generators' sharing the connection asset will have their Availability level remain at their Technical Availability.
- This SEMC can confirm that this decision paper applies to both transmission and distribution connected generators. All of the above decisions should be applied for both transmission and distribution connected generators.

2 INTRODUCTION

2.1 PURPOSE OF THIS PAPER

The following paper details the SEMC's decision on the calculation of Outturn Availability. The RAs published a minded to decision paper ("the Minded to Decision") on 23 February 2015 and received responses to the paper from the following 11 sources:

- ESB Networks (ESBN)
- ESB Generation & Wholesale Markets (ESBGWM)
- Eirgrid and SONI, the Transmission System Operators (TSOs)
- Bord na Mona PowerGen (BnM)
- Power NI Energy Power Procurement Business (PPB)
- Brookefield Renewable
- AES
- SSE
- Bord Gais Energy (BGE)
- Electricity Association of Ireland (EAI)
- Irish Wind Energy Association (IWEA)

Key themes raised within these responses will be discussed in this paper and the SEMC's decisions outlined.

2.2 BACKGROUND INFORMATION

The Minded to Decision provides detailed background on the issue of the calculation of Outturn Availability, the current regimes in place in the Republic of Ireland and Northern Ireland, and the RAs' proposed actions on the matter.

As a summary, current practice adopted in Northern Ireland is that generators connected at the busbar (the "new" position) are deemed Outturn unavailable if there is any outage of the connection asset. Generators connected at the HV transformer bushing (the "legacy" position) are deemed Outturn Available if there is an outage of the connection asset in all cases (i.e. for fault repair or maintenance). Current practice for Transmission connected generation in Republic of Ireland is that all generators are compensated for transmission outages arising from forced maintenance and certain types of corrective maintenance. However, for all other works (impacting the Availability of connection assets owned by the TAO) they are deemed to be Outturn unavailable, with the exception of generators with temporary connection assets.

Within their Minded to Paper the RAs made proposals in relation to the following:

- Definition of Availability and Outturn Availability
- Arrangements for the calculation of Outturn Availability
- Outage Planning
- Temporary Connection Assets
- Extensions to or changes at existing connections

The proceeding paragraphs summarise the proposals made in the Minded to Decision, the responses to these proposals and the SEMC's decision on each matter.

3 RESPONSES TO THE MINDED TO DECISION AND SEMC DECISIONS

3.1 GENERAL RESPONSES TO MINDED TO DECISION

The majority of respondents recognised that the Minded to Decision can be seen as somewhat of a compromise between the TSOs, Transmission Asset Owners ("TAOs") and generators, from the viewpoint of the consumer.

The general consensus within the responses is that the Minded to Decision is an improvement on the current treatment of Outturn Availability, but that the proposed decision does not go far enough as it still does not set 'market' Outturn Availability at a generators Technical Availability in all instances of network outages.

Multiple responses mention the fact that any changes to the current custom and practice should take into consideration any market restructuring, emerging from the I-SEM consultations.

Furthermore the TSOs noted that there are different regulatory/licence frameworks in Ireland and Northern Ireland and argue that the Minded to Decision as written suggests that the roles of the TSOs (Eirgrid and SONI) and TAOs (ESBN and NIE) are aligned in the two jurisdictions. The TSOs go on to state that SONI does not have responsibility for maintenance policy, maintenance requirements, or maintenance durations in Northern Ireland and acts as a scheduler of outages, of which a portion is driven by maintenance outages requested by NIE. In Ireland, EirGrid in collaboration with ESBN determines maintenance policy and requirements and ultimately schedules maintenance outages into the wider outage plan, based on information provided by ESBN, who in turn determines the durations required and Availability of resources. The TSOs ask that the final decision paper from the SEMC clearly apportion specific actions on the appropriate licenced party (EirGrid, SONI, ESBN or NIE) responsible in each jurisdiction.

Some respondents argued that historical disputes (as lodged in anticipation of this decision) should be settled in accordance with this decision paper as there is no agreed custom and practice. However, the TSOs in their response, assume that the final decision on the process for the calculation of Outturn Availability will not be applied retrospectively. The SEMC agree with the TSOs in that this decision paper will not be applied retrospectively.

3.2 DEFINITION OF AVAILABILITY AND OUTTURN AVAILABILITY

PROPOSALS IN THE MINDED TO DECISION

In the Minded to Decision the RAs were of the view that there should be a difference between the definitions of Availability and Outturn Availability. The RAs agreed with the TSOs' assertion that Availability, as defined in the Grid Code, relates to the Technical Availability of a generating unit. Outturn Availability should relate to the commercial capability of a unit. However, Outturn Availability is not adequately defined in the TSC and is not defined in the Grid Code. This has resulted in the commercial capability of a unit being determined at the discretion of the TSO.

Therefore the RAs were of the view that the status quo is not appropriate and that modifications to the respective codes should be made to clearly define Availability and Outturn Availability. The RAs proposed to request that the relevant modifications to the Codes in Ireland and Northern Ireland were brought forward by the TSOs to the Grid Code Review Panels and Modifications Committee by no later than the next meeting for the relevant forum following three months from the date of a final decision on this matter.

RESPONSE – CODE CHANGES REQUIRED

The majority of responses accept that at present the definitions of Availability and Outturn Availability in the Grid Codes and the TSC do not align and require further consideration at the relevant review panels.

Respondents to the Minded to Decision felt that it would be useful if the RAs could clarify what modifications would be required to both Grid Codes and the TSC and provide a specific work programme for each of the relevant committees. A number of respondents noted that there needs to be clear definitions of the type of maintenance that will have an impact on the definition of 'Outturn Available' and the related compensation. It is important to note exactly what will constitute an Outturn Available outage, for example what is corrective maintenance and what is preventative, as this will ensure there is transparent policing by all parties affected by the outage – namely the generators and the TSO.

One respondent noted that they can see merit in using the existing Grid Code Review Panels and Modifications Committee as the forum to effect the changes. Another respondent agrees with the proposals to modify the Codes so as to improve transparency and consistency.

SEMC DECISION

The SEMC requires that the TSOs bring forward a modification, commensurate with this decision paper, to the next Grid Code Review Panel and Modifications Committee meeting, following the publication of this decision paper.

3.3 CALCULATION OF OUTTURN AVAILABILITY

PROPOSALS IN THE MINDED TO DECISION

The RAs proposed that no changes should be made to the current arrangements for the calculation of Outturn Availability for generators connected at the "legacy" position in Northern Ireland. No issues have been recorded with the operation of these rules and the RAs were not minded to make any changes in relation to these generators. For Northern Ireland generators connected at the "new" position the RAs proposed that generators be considered Outturn Available for all connection asset outages with the exception of annual maintenance outages lasting up to and including five business days.

In Ireland, the RAs proposed that where the connection assets are owned by the TAO, the generator will be considered Outturn Available for all outages with the exception of scheduled annual maintenance outages lasting up to five business days inclusive or less per outage season[4]. It was considered that this strikes the appropriate balance between incentivising generators to align with transmission outages and incentivising the TSO to complete maintenance works in a timely manner. It also removes any perceived incentive on the TSO to inappropriately categorise an outage as annual maintenance. The five day period was chosen as it covers the majority of maintenance outages. In due course this period may be changed and/or refined to differentiate between different types of maintenance outages.

RESPONSE – OUTTURN AND TECHNICAL AVAILABILITY SHOULD BE THE SAME

The majority of respondents believe that Outturn Availability should be set to the Technical Availability of the generation unit for all transmission outages. Respondents argue that the difference between Technical Availability and "Market" Availability is down to the Availability of the network beyond the generators connection point which is not in the control of the generator. If the generator is Available to deliver power to the connection point but cannot

[4] For the avoidance of doubt where a generator is on outage for their own reasons they will be deemed Outturn unAvailable. e.g. if maintenance is scheduled for 10 days and the generator outage is on scheduled outage for its own reasons for the same 10 days, the unit will be Outturn unAvailable for the full 10 day period.

export due to grid issues beyond the connection point then the generator is Technically Available.

Respondents argue that any divergence from this would conflict with the High Level Design ("HLD") principles of the SEM which provide that the market schedule is based on the unconstrained Availability of generating units. The TSC reflects this HLD principle. Multiple respondents asserted that the Minded to Decision undermines the firm access policy in the SEM and exposes participants with firm access to commercial risk during network outages.

Respondents also argue that this option will present the least cost to the consumer. Where a generator that is within-merit is deemed to have an Outturn Availability of 0MW, then more expensive generation will be required to meet demand.

RESPONSE – USE OF 5 BUSINESS DAYS IS NOT APPROPRIATE

The majority of respondents were concerned at the provision for a 5 "business day" period for annual connection asset maintenance outages. The RAs must ensure that the TSO/TAO are not now incentivised to use the 5 days of outages without compensation as a standard and are still incentivised to minimise outage duration. Some respondents argued that international benchmarks should be used to justify this number, with multiple respondents stating that the consensus view is a median duration of 3 days.

Additionally respondents argued that given maintenance can be performed on a 24/7 basis there is no justification in providing for 8-hour, weekday "business days" and they would urge the RAs not to include this relatively artificial limitation. Another respondent commented on the fact that the definitions of the start (technical start/isolated plant) and end of any outage must be transparent and included in the number of days allowed.

The TSOs argue that five calendar days rather than five business days should apply. It is irrelevant to a generator unable to export onto the transmission network due to a transmission outage whether that outage occurs on a business day or weekend day. The TSOs suggest the RAs consider five calendar days rather than five business days. Furthermore, the TSOs request the RAs' affirmation of the TSOs' interpretation regarding Outturn Availability in different outage scenarios. Presently, the transmission outage season (including both capital and maintenance outages) runs from the start of March to the end of November (variable in recent years). Transmission maintenance outages are however facilitated all year round. Therefore, the TSOs propose to apply the arrangements for the calculation of Outturn Availability on a calendar year basis (1st January – 31st December).

SEMC DECISION

The SEMC endorses the following:

- No changes will be made to the current arrangements for the calculation of Outturn Availability for generators connected at the "legacy" position in Northern Ireland. Generators connected at the "legacy" position are deemed outturn available if there is an outage of the connection asset in all cases (i.e. for fault repair or maintenance).
- For Northern Ireland generators connected at the "new" position, the SEMC have concluded that generators will be considered Outturn Available for all connection asset outages with the exception of annual maintenance outages lasting up to and including five calendar days.
- For ROI generators, the SEMC have concluded that generators will be considered Outturn Available for all connection asset outages with the exception of annual maintenance outages lasting up to and including five calendar days.
- The SEMC endorses the TSOs' proposal to apply the arrangements for the calculation of Outturn Availability on a calendar year basis.

This decision allows for harmonisation of the arrangements North and South, while taking into account the different legacy issues which are in place in the two jurisdictions. The SEMC disagrees with the assertion that Outturn Availability should be set to the Technical Availability of the generation unit for all transmission outages as no incentive would then exist on the generators to align outages in the most efficient manner if this was the case. The SEMC considers that its decision strikes the appropriate balance between incentivising generators to align with transmission outages and incentivising the TSOs to complete maintenance works in a timely manner.

The SEMC feels responses questioning the use of "5 business days" are warranted and agrees that this rule exposes generators to arbitrary day of the week effects, unnecessarily. No generator has submitted data to support the 3 day argument and the use of 5 calendar days is seen as a reasonable compromise by the SEMC.

The response that Outturn Availability being set to the Technical Availability for all transmission outages provides the least cost Outturn to the consumer is unsupported. The TSO analysis of the effect on System Marginal Price ("SMP") and constraint payments is only based on the effect of removing a constrained wind farm.

The SEMC is satisfied that their decision, on the calculation of Outturn Availability, strikes a sensible balance between the HLD principles and the reality of providing for preventative maintenance on the network.

3.4 OUTAGE PLANNING

PROPOSALS IN THE MINDED TO DECISION

Within the Minded to Decision the RAs recommended that a forum be established, containing representation from all parties, with regular meetings timetabled to address any issues relating to outage planning. The RAs felt the forum would increase the transparency of the Outage Planning process and allow all parties to have a greater understanding of any issues and their impact.

The RAs proposed that as part of this process the relevant TSO or TAO in each jurisdiction should continue to further develop outage plans. These plans should be published and detail all the works that are to be carried out along with the expected timescales.

The RAs further proposed that an ex-post summary report of the outage schedule should be published at the end of each outage season. This ex-post summary would detail all works carried out over the period. The outage time for each of the works will be identified and compared against the pre-determined targets agreed between the parties and communicated in the outage plan. This review should be in the form of a public document.

RESPONSE - TSOS ALREADY TRY TO ALIGN MAINTENANCE WORKS

The TSOs noted that they already create their transmission outage plan to fit around the generator outage schedule and seek to align outages to the generators outages and changes to the same, where possible, recognising that there can be a knock on impact on grid delivery and/or dispatch balancing costs. Minimising outages is of key importance to the TSOs given that outages impact on system security, security of supply to customers, system minutes lost, DBC, operational complexity, operational risk, and impact to customers commercially.

Furthermore another respondent noted that there are already suitable requirements placed on SONI in the NI Grid Code to co-ordinate outages with generators and TAOs, however there are less commercial incentives on the TAO to co-ordinate.

RESPONSE – GENERATORS IN SUPPORT OF FORUM

Respondents feel the forum would introduce a voice for generators into the transmission planning process and will serve to increase the transparency of the process. Respondents agreed that the forum working group should be required to look at, not just short-term planning and related issues, but also the longer term to ensure effective outage planning. The forum will only be effective if its purpose is clear and it is effectively managed by the RAs. The forum must enable detailed discussion to take place on the precise nature of the planned outages, their duration and the detailed planned works so that stakeholders can understand why outage planning decisions are being made.

One respondent commented that such a forum may also be of value to distribution connected generators and, if such a forum was created, an invitation could be extended to these customers.

The TSOs suggest that a bilateral engagement (where proposed outages are discussed in detail) should not be substituted by a forum on outages. A forum discussing the particulars of specific generator outages may not result in a meaningful engagement given the possible commercial sensitivities involved for the stakeholders.

RESPONSE – GENERATOR SUPPORT FOR CHANGES TO OUTAGE PLANNING

Most respondents commented favourably in relation to the proposal for the development of outage plans with detail in relation to the types of maintenance and the relevant timescales for the works. Respondents stated that this document must contain the relevant level of detail on the maintenance required for the various types of connection assets (transformers, overhead, underground lines etc.) and that the required timelines should be agreed with stakeholders.

In their response the TSOs noted that in Ireland the timescales for carrying out work are determined by the TAO and that there is already a document published on the EirGrid website detailing the various types of annual maintenance[5]. The TSOs proposed that this document could be updated to include the estimated timescales for each type of maintenance, where provided by the TAO. It may be appropriate subsequently to review the document, again in collaboration with ESBN, on an annual basis to incorporate any changes to the standard outage durations for maintenance activities. In Northern Ireland, all maintenance is the responsibility of the TAO (NIE). SONI can facilitate the publishing of a link to such a document on its website.

[5] http://www.eirgrid.com/media/GuidetoEirGridTranmissionEquipmentMaintenanceSept2013.pdf

One respondent stated that it was not clear as to the purpose of publishing any detail on 'standard' outage durations as actual outage durations are often station and plant specific. The respondent stated that it may be possible to provide a table of planned maintenance tasks (based on EirGrid's document – 'Guide to Maintenance Activities') and typical outage durations which prevailed prior to the new work methods introduced last year. The respondent argued that the impact of revised methods in stations is yet to be determined. For this reason, the respondent suggested that it would be better not to publish any detail on outage durations until the impact of the new work methods is better known.

RESPONSE – SUPPORT FOR EX-POST SUMMARY REPORT

The majority of respondents welcome the proposed publication of an ex-post summary report that compares the planned outage schedule to actual outages. Multiple respondents also argued that the logical next step beyond reporting on the performance of the TSO and TAO against their outage plans is to introduce commercial incentives for them to do so.

In their response the TSOs highlighted that there is a difference in Ireland and Northern Ireland regarding the TSOs' responsibilities for transmission maintenance. Therefore, in order to publish a single report the TSOs propose the report compares planned scheduled outage durations against the actual outage durations and does not include details of the work carried out.

SEMC DECISION

The SEMC decision requires that the TSOs establish a forum which will be responsible for the:

- Publication of an ex-ante outage plan for NI and a separate ex-ante outage plan for ROI, and
- Publication of an ex-post summary for NI and a separate ex-post summary for ROI

The SEMC requires that the forum contains representation from all parties including generators, TSOs and TAOs. Regular forum meetings are to be timetabled to address any issues relating to outage planning and the forum are required to look at not just short-term planning and related issues but also the longer term to ensure effective outage planning. As stated above one respondent argued that the impact of revised methods will impact on outage durations. The SEMC feels that this is a good example of the type of issue where a forum setting would be beneficial and help to ensure all participants are kept up to date with changing circumstances.

The TSOs raised concerns as to the effectiveness of a forum and the SEMC would like to communicate that this forum is intended to supplement bilateral engagement (where proposed outages are discussed in detail) rather than replace them.

As part of this forum process both the TSO and TAO in each jurisdiction should work collaboratively, where required, to develop outage plans. These plans should detail all the works that are to be carried out, along with the expected timescales for each of the works, and be published on the relevant TSO website. In terms of creating an ex-ante outage plan, the SEMC agrees with the TSOs proposition that the document already published on Eirgrid's website[6] could be updated to include the estimated timescales for each type of maintenance. The SEMC also requires that the TSOs, in collaboration with the TAOs, review the document, for each outage season, to incorporate any changes to the standard outage durations for maintenance activities.

The TSOs stated that, in Northern Ireland, all maintenance is the responsibility of the TAO (NIE) and that SONI can facilitate the publishing of a link to such a document on its website. In response to this the SEMC would note that SONI has the responsibility for transmission planning and therefore should liaise with NIE in order to fulfil their responsibilities under this decision paper. The SEMC requires that SONI provide an ex-ante outage plan in line with the requirements placed on Eirgrid, through collaboration with NIE.

The SEMC also requires that each TSO publishes an ex-post summary report of the outage schedule at the end of each outage season. This will detail all works carried out over the period. The outage time for each of the works will be identified and compared against the pre-determined targets agreed between the parties and communicated in the ex-ante outage plan. This review should be in the form of a public document. The SEMC does not agree with the TSOs' proposal that the ex-post summary report should not include details of work carried out.

The SEMC requires that the ex-ante outage plans and the ex-post summaries, for each outage season, be sent to the RAs for review.

3.5 TEMPORARY CONNECTION ASSETS

PROPOSALS IN THE MINDED TO DECISION

It was the view of the RAs, that for all outages a generator with a temporary connection asset should have its Outturn Availability set to zero. As has previously been stated the driver of the

[6] http://www.eirgrid.com/media/GuidetoEirGridTranmissionEquipmentMaintenanceSept2013.pdf

outage in this case is the generators own construction works, to facilitate their connection with the system. It is for this reason that the RAs considered that it is not appropriate to make such generators whole.

RESPONSE

The TSOs, within their assumptions, state that the Outturn Availability of generators with temporary connection assets will be zero only for outages that are driven by the generators' own construction works. The TSOs assume that any other transmission outages affecting the generators on temporary connection which are not driven by the generators' own construction works will be subject as normal to the final process for the calculation of Outturn Availability.

SEMC DECISION

The SEMC decision endorses the position that a generator with a temporary connection asset should have its Outturn Availability set to zero for all outages caused by their own construction works.

Furthermore the SEMC agree with the TSOs' assumption that any other transmission outages affecting the generators on temporary connection which are not driven by the generators' own construction works will be subject as normal to the final process for the calculation of Outturn Availability.

3.6 EXTENSIONS TO OR CHANGES AT EXISTING CONNECTIONS

PROPOSALS IN THE MINDED TO DECISION

It was the view of the RAs that where work is being carried out that is related to an existing generator, Outturn Availability will equal zero. However, where work is being carried out to another generator (with a different connection point but a shared asset) then Outturn Availability will equal that of the generator's Technical Availability.

RESPONSE –FURTHER CLARITY REQUIRED

Responses to the Minded to Decision broadly welcome the proposal to differentiate between generators that share a common transmission asset when work is being carried out on the generator's connection point. Multiple respondents seek further clarity on the issue as discussed below.

The TSOs welcome the clarity the RAs have provided and request the RAs to consider the following situation and clarify what the Outturn Availability of the existing generator would be; under existing CER approved connection policy in Ireland, a wind farm can phase its installation over a period of up to three years. Each phase can be connected to the existing connection point. Once the initial phase is up and running work to connect the subsequent phases may drive prolonged outages of the connection point. It is the TSOs current position (which is normally reflected in the Connection Agreement) that the Outturn Availability of the in-situ phases is zero.

One respondent sought clarity around the definition of a connection asset where the maintenance of connection assets should only mean the maintenance of a generators shallow connection assets and not maintenance to any deep reinforcements. The same respondent also asked for clarity on the treatment of shared connection assets and who the outage will apply to within the group of generators sharing the connection assets.

SEMC DECISION

The SEMC decision endorses the position that where work is being carried out that is related to an existing generator, Outturn Availability will equal zero. However, where work is being carried out to another generator (with a different connection point but a shared asset) then Outturn Availability will equal that of the generator's Technical Availability.

In relation to the TSO wind farm situation described above, the SEMC can confirm that the Outturn Availability of the in-situ phases is zero.

In response to the request for clarification around shallow connection assets and deep reinforcements, the SEMC agrees that maintenance of connection assets should only mean the maintenance of a generators shallow connection assets and not maintenance of any deep reinforcements.

Additionally in relation to the issue of shared connection assets and who the outage will apply to within the group of generators sharing the connection assets, the SEMC requires that any scheduled outage will apply to all the generators using the connection asset. On the other hand, any maintenance caused by a particular generator's construction work will lead to that generator being declared Outturn unavailable but the other generators' sharing the connection asset will have their Availability level remain at their Technical Availability.

3.7 DISTRIBUTION CONNECTED GENERATORS

RESPONSE – DISTRIBUTION CONNECTED GENERATORS NOT ADDRESSED

Multiple responses noted that the Minded to Decision does not specifically address distribution connected generators. No guidance has been provided in the Minded to Decision as to the treatment of distribution network outages despite the fact that, in the TSC, no distinction is made between transmission and distribution outages. Formal rules are needed to ensure that distribution connected generators are treated in the same manner as transmission connected generators.

SEMC DECISION

This SEMC can confirm that this decision paper applies to both transmission and distribution connected generators. All of the above decisions should be applied for both transmission and distribution connected generators.