

# EIRGRID INTERCONNECTOR DAC

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26th August 2024

## Re: Amendments to Load Frequency Control Block Operational Agreement (LFCBOA) following ramping trails

Dear Customer and Connections,

EirGrid Interconnector DAC (EIDAC) welcomes the consultation on proposed amendments of LFCBOA post Greenlink interconnector commercial go-live. The new interconnector represents a significant step forward in enhancing the resilience and integration of SEM.

However, upon reviewing the proposed ramp rates of 15MW/min from 10MW/min previously for all HVDC interconnectors connecting the synchronous area IE/NI (EWIC, Moyle and Greenlink being 5MW/min each), we believe this is still considerably lower than what is required for an efficient market with implicit auctions and this should be a first step increasing the ramp rate for the interconnectors connecting to SEM. The rate of 15MW/min for the island does not provide the necessary flexibility, particularly with the increasing integration of renewable energy sources (offshore wind).

Our primary concern is that lower ramp rates hinder efficient utilisation of EWIC, limiting its ability to respond beyond the proposed 5MW/min ramp rate. This can often lead to imbalance costs due to the interconnector being unable to maintain its schedule because of ramping limitations. This can result in imbalance costs which ultimately impact negatively on the end consumer.

Increased ramping capability for interconnectors is crucial for several reasons:

- Integration of Renewable Energy:** As the share of variable renewable energy sources like wind and solar increases, the ability to quickly ramp up or down the power flow between regions becomes vital. This helps in balancing supply and demand, ensuring grid stability when renewable generation fluctuates.
- Grid Stability and Reliability:** Interconnectors is a highly efficient piece of infrastructure on the grid with high ramping capabilities that can respond swiftly to sudden changes in electricity supply or demand. This is especially important during unexpected events, such as the sudden loss of a power plant or a spike in demand, helping to maintain a stable and reliable grid.

EIDAC Chairperson Michael Mahon  
Directors Michael Behan, Liam Ryan  
Company Secretary Martin Corrigan

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3. **Economic Efficiency:** Enhanced ramping allows for more efficient utilization of cross-border energy trade. This can lead to cost savings by reducing the need for expensive peaking power plants and allowing access to cheaper electricity sources across borders.
4. **Decarbonisation:** By facilitating the integration of renewable energy sources and reducing reliance on fossil fuels, improved interconnector ramping contributes to the decarbonisation of the energy sector, supporting efforts to meet climate goals.
5. **Energy Security:** Increased ramping capabilities enhance the flexibility of the grid to import or export electricity in response to regional shortages or surpluses, thus improving energy security and resilience against supply disruptions.

We urge the TSO to re-evaluate the ramping rate parameters as a future step to ensure they align more closely with the needs of the market (economic efficiency). We recommend considering adjusting the ramp rates to better reflect the rapid changes in supply and demand. Moreover, ensuring that the ramp rates facilitate integration of more renewable energy sources by permitting a faster cross-border response to system frequency excursions and thereby enhancing security of supply and supporting overall decarbonisation goals. We also believe that the loss factor associated with interconnector scheduling needs to be reviewed since it does not account for whole system losses and is therefore not reflective of the true cost of power transmission.

Thank you for your continued cooperation.

Yours Sincerely,

*David Hargadon*

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