ESB Networks Response

Criteria for Granting Derogations Pursuant to Articles 62 and 63 of the Requirements for Generator Commission Regulation (RfG) 2016/631 of 14th April 2016

09th March 2017
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Introduction
ESB Networks welcomes the opportunity to respond to this consultation. This document sets out ESB Networks’ (as DSO) response to a number of points.

Response Points:

Executive Summary Section Page ii
It may be necessary to highlight that the type C or D PGM’s mentioned in this section are not the same as type C and D generators as included in the Distribution Code.

Background section 1.2 page 3
It may be necessary to highlight that the Type A – D bands included in the table are themselves subject to consultation.

Proposed Criteria for Derogation Request section 2.1 page 5
6. The Potential for Discriminating Treatment of existing PGMs
This puts a requirement on the PGM to confirm that no other PGM has demonstrated compliance. It might be more appropriate to state ‘none of the other comparable PGM (in terms of size and technology) facility owners have already demonstrated ....’