Respondent No. 1 - Draft Grenada Electricity Sector Grid Code

- Draft Grenada Electricity Sector Grid Code – Introduction Code;
- Draft Grenada Electricity Sector Grid Code – Generation Codes; and
- Draft Grenada Electricity Sector grid Code – Transmission and Distribution Code.

The objectives of our review and comments are to ensure that the interconnection process is as easy and efficient as possible for renewable energy generators, that network licensees are held accountable to renewable energy generators from System Impact Studies to Interconnection, that interconnection costs are as low as possible for renewable energy generators, and finally, to ensure that the required operating activities are as minimal as possible for renewable energy generators.

Our general comment is that in order to achieve the optimum amount of renewable energy participation in Grenada, energy storage must be integrated into the network since renewable generation is an intermittent source of power. It is strongly advised that the Commission considers offering licenses not only for generation but also for energy storage so that the power grid may be more reliable and dependable. Furthermore, if a renewable generator has integrated energy storage contained therein, a higher PPA rate and priority should be given when processing this license.

Our further comments are as follows:

1. The framework should regulate the costs associated with a Network Licensee's performance of a System Impact Study and grid connection for a renewable generator;

2. Maximum timelines should be outlined in the draft for the Network Licensee to process a System Impact Study for a renewable generator, for example, a period of 60 days from the date of submission of such study; in so doing, the Network Licensee shall process the interconnection assessment confirming that the generator can connect to the grid and outline the Network Licensee's costs involved for the interconnection that are to be paid by the generator;

3. **Appendix A**: A provision should be included for communication equipment requirements which should be dependent on the system size of the generator. For example, a larger system will have a bigger impact on the grid but a smaller system that will have less impact should not have the same requirements. It is also suggested that the Commission considers having different tiers with requirements (i.e. 100 kW and over, 1 MW and over, etc.);

4. **GC 5.3** - Log should only apply to renewable systems over a certain size (i.e. 1 MW). It appears that it will not make economic sense to have all of that information recorded and logged for a smaller system;

5. **GC 8.1**- It is suggested that 500 KW be changed to 1 MW. 1 MW and under should not require such extensive maintenance planning;

6. **GC 2.5 - Disconnection without notice**: We respectfully suggest that the language be softened as any disconnection would mean loss of revenue;

7. **GC 5.5.2**: - Do confirm whether this only applies in respect of non-renewable energy sources as it appears nonsensical to have same for renewable generation;

GC 10 - Force Majeure: We want to ensure that in the event of a natural disaster, such as hurricanes, floods etc., our generation license/contract is not compromised or at risk to be terminated. Further, we note that equipment may take some time to be shipped to Grenada in such a case;

Thank you,