

Fault Ride Through / Active Power Recovery / Rate of Change of Frequency Grid Code Modification (MPID345)

Compliance and Derogation Framework

September 2026



The Oval, 160 Shelbourne Road, Ballsbridge, Dublin D04 FW28
Telephone: +353 1 677 1700 | www.eirgrid.ie

Contents

1.	Introduction	4
2.	Compliance and Derogation Framework	5
2.1	Background	5
2.2	Compliance with the Grid Code and Overview of Compliance and Derogation Processes	5
2.3	Overview of the Compliance and Derogation Framework	6
2.4	Group / Non-Group Processes	7
3.	Demand Utilisation Threshold	14
3.1	Overview	14
3.2	Application of the Demand Utilisation Threshold	14
3.3	Determining the Demand Utilisation Threshold	15
4.	Monitoring	17
5.	Compliance Assessment	20
5.1	Overview	20
5.2	Study Assessment Guides	20
5.3	Derogations Register	20
6.	Appendix 1 - Group A Derogation Application form	22
7.	Appendix 2 - Group B Derogation Application form	25
8.	Appendix 3 - Non-Group Derogation Application Form	27
9.	Appendix 4 - Compliance Plan Guidance Note	30

Glossary of terms

Acronym	Meaning
APR	Active Power Recovery
BESS	Battery Energy Storage System
CRU	Commission for Regulation of Utilities
ESB	Electricity Supply Board
FRT	Fault Ride Through
HVDC	High Voltage Direct Current
Hz	Hertz (unit of frequency)
kV	Kilo-Volt
MEC	Maximum Export Capacity
MIC	Maximum Import Capacity
MVA	Mega Volt-Ampere
MW	Mega Watt
NESO	National Energy System Operator
OEM	Original Equipment Manufacturer
RoCoF	Rate of Change of Frequency
SEMO	Single Electricity Market Operator
SONI	System Operator for Northern Ireland
TSO	Transmission System Operator
UPS	Uninterruptible Power Supply

1. Introduction

This document sets out the Compliance and Derogation Framework ('Framework') that will support implementation of the Demand Facility Fault Ride Through, Active Power Recovery and Rate of Change of Frequency (FRT/APR/RoCoF) Grid Code Modification MPID345¹ ('MPID345').

On 1st April 2026, and following a period of extensive engagement with Industry, EirGrid submitted its MPID345 Grid Code modification proposals along with an associated Compliance and Derogation Framework, to CRU for approval. Further to this submission, EirGrid then submitted additional information to support CRU's call for further representations² on these proposals in July 2026.

CRU subsequently published its decision CRU2026145 on these proposals on 22nd September 2026. This document reflects CRU's decision by setting out the arrangements through which Demand Facilities will progress derogations from, and compliance with, MPID345 requirements.

This document also sets out arrangements for the calculation, application and monitoring of Demand Utilisation Thresholds to manage non-MPID345-compliant demand so that the security of the power system can be maintained while Demand Facilities progress towards compliance.

Guidance on compliance plans and derogation form templates are also set out in this document.

¹ <https://www.eirgrid.ie/grid/grid-codes-and-compliance-overview/grid-code-modifications>

² [Grid Code Modification MPID 345 and Compliance and Derogation Framework: Request for further representations | The Commission for Regulation of Utilities \(CRU\)'s Consultation Portal](#)

2. Compliance and Derogation Framework

2.1 Background

As identified in the EirGrid Grid Code Modification Recommendation Form MPID345³, there is an urgent need to address the system security issues presented by Demand Facilities' collective fault response, as the power system is approaching a limit to the level of demand loss that can be securely accommodated. EirGrid therefore requires mechanisms to manage the risk to the power system pending Demand Facilities achieving full compliance with the new requirements introduced by MPID345.

As set out in the introduction to this Framework, MPID345 and the associated Compliance and Derogation Framework outlined in this document will support EirGrid's ability to manage the current issue while allowing Demand Facilities to assess and progress compliance in a timely manner. The key benefits of the streamlined 'group' approach within the Framework are:

- An effective date for MPID345 falling five weeks after CRU approval will allow time for Demand Facility owners to seek a streamlined derogation, for EirGrid to review applications and make recommendations, and for CRU to approve or reject streamlined derogations.
- The option of a conditional, 24-month derogation for all existing data centre Demand Facilities which will provide time for data centre Demand Facility owners to achieve compliance with MPID345.
- The option of a conditional, 5-year derogation for all existing non-data centre Demand Facilities which will provide time for non-data-centre Demand Facility owners to achieve compliance with MPID345.
- The ability for EirGrid to manage the risk to system security through a targeted demand utilisation threshold ('DUT').
- The derogation periods referred to above will allow time for Demand Facilities to prepare and submit compliance plans and for EirGrid and CRU to carry out their respective assessments, recommendations and decisions in respect of compliance plans and any further derogation requests.

A non-group compliance and derogation process is open to all Demand Facilities who do not wish to avail of the streamlined 'group' approach.

2.2 Compliance with the Grid Code and Overview of Compliance and Derogation Processes

All Demand Facilities with a Transmission Connection Agreement are required to comply with the Grid Code (including any amendments), insofar as the Grid Code is applicable to them. By default, a Modification to the Grid Code becomes binding on Demand Facilities from the date specified in the CRU Modification approval notification. To date, there have been c.350 proposed amendments to the Grid Code.

Derogations are provided for under GC.9 of the Grid Code. Under GC.9.1 of the Grid Code, if a Demand Facility finds that it is, or will be, unable to comply with any provision of the Grid Code, then it is required to report such non-compliance to the TSO without delay and (subject to the provisions of the relevant derogation procedure) make such reasonable efforts as are required to remedy such non-

³ [MPID345-Grid-Code-Modification-Recommendation-Form](#)

compliance as soon as reasonably practicable. GC.9.1.2 provides that if the Demand Facility believes either that it would be unreasonable (including cost and technical considerations) to require it to remedy such non-compliance or that it should be granted an extended period to remedy such non-compliance, it shall promptly submit a request for a derogation to the TSO.

The relevant derogation procedure is set out at GC.9.3.3. A request for a derogation is made by submission of a derogation application form.

- Data centre Demand Facility owners utilising either the streamlined ‘group’ or the ‘non-group’ derogation process shall have six (6) months from the Grid Code Modification effective date to submit their compliance plans.
- Non-data centre Demand Facility owners utilising either the streamlined ‘group’ or the ‘non-group’ derogation process shall have twelve (12) months from the Grid Code Modification effective date to submit their compliance plans.

In its consideration of a derogation request by a Demand Facility, the TSO may contact the relevant Demand Facility to obtain clarification of the derogation request, or to obtain further information regarding the request, or to discuss changes to the request. Once the derogation request has been validated by the TSO, a reference number is assigned.

The TSO will then assess the derogation request and provide to the CRU an assessment and a recommendation.

On receipt of a derogation assessment and recommendation from the TSO, the CRU will consider the derogation request, the TSO’s assessment and the TSO’s recommendation. In its consideration of a derogation request by a Demand Facility, the CRU may contact the relevant Demand Facility and/or the TSO to obtain clarification of the request, or to obtain further information regarding the request, or to discuss changes to the request.

Provided that the CRU considers that the grounds for the derogation are reasonable, then the CRU shall grant such derogation unless the derogation would, or it is likely that it would, have a materially adverse impact on the security and stability of the Transmission System operated by EirGrid or the Transmission System operated by SONI in Northern Ireland or impose unreasonable costs on the operation of the Transmission System or on other users.

The above is the standard Derogation Application approach as set out in the Grid Code. In this case, as EirGrid anticipates that there will initially be an inability to comply with the requirements across most existing transmission connected Demand Facilities as technical solutions remain under development, EirGrid sets out a streamlined ‘group’ derogation application process, the details of which are set out in the below sections.

2.3 Overview of the Compliance and Derogation Framework

MPID345 has an effective date falling five (5) weeks after the date of CRU approval. This five-week period before MPID345 comes into effect will allow time for transmission connected Demand Facilities to seek a derogation in the form of the streamlined, conditional, time-limited derogation (referred to below as the ‘group’ derogation).

The following provides an overview of the Framework:

- All Demand Facilities will be required to either demonstrate compliance with MPID345 or seek a derogation, in each case on an individual Demand Facility basis.
- For those Demand Facilities seeking a derogation, there are three options outlined within the Framework, each with its own timelines and conditions, and each Demand Facility must opt for one of these options, as applicable:
 - A group compliance and derogation process for Data Centre Demand Facilities connected before the end of 2026;

- A group compliance and derogation process for Non-Data Centre Demand Facilities connected before the end of 2026;
- and,
- A non-group compliance and derogation process open to all Demand Facilities who do not wish to avail of the standard terms and conditions.
- The group compliance and derogation process for Data Centres will provide for a 24-month derogation from the MPID345 requirements.
 - The group compliance and derogation process for Non-Data Centres will provide for a 5-year derogation from the MPID345 requirements.
 - The group compliance and derogation process for Data Centre Demand Facilities will include the application of a Demand Utilisation Threshold (DUT) which will apply to each Data Centre Demand Facility. The DUT will set a limit on the monthly average non-compliant demand utilisation (in MW) at each Data Centre Demand Facility, which will allow for some temporary peaks subject to the requirements of system security. The details in relation to the DUT are outlined in Section 3 below.
 - The DUT may be revised by CRU should a material change in circumstances arise, in accordance with GC.9.1.4 of the Grid Code. EirGrid shall be monitoring and may also revise the rules regarding peaks above the DUT, in accordance with the CRU's decision on MPID345.
 - Data Centre Demand Facilities which can demonstrate full compliance with MPID345 requirements in accordance with section 5 (i.e. that do not require a derogation) may utilise up to their full contractual MIC and will not be subject to a separate DUT. Data Centre Demand Facilities with a portion of MPID345-compliant demand may utilise that portion of their demand with no derogation-imposed limitations, but that portion of their demand which is not compliant with MPID345 will require the Demand Facility owner to seek a derogation, and that portion of their demand will be subject to a DUT.

The Framework is outlined in more detail in the following sections.

2.4 Group / Non-Group Processes

As outlined above, the Framework will allow for three derogation options:

- A group compliance and derogation process for Data Centre Demand Facilities connected before the end of 2026;
- A group compliance and derogation process for Non-Data Centre Demand Facilities connected before the end of 2026; and
- A non-group compliance and derogation process open to all Demand Facilities who do not wish to avail of the standard terms and conditions.

This data centre / non-data centre categorisation of Demand Facilities is based on:

- The distinguishing electrical characteristics of these types of Demand Facility;
- Comparisons of observed performance during past fault events; and
- Data Centre Demand Facility modelling.

As an alternative to the group derogation, all Demand Facilities may choose to follow a non-group (standard) derogation process. However, there are risks with this standard (non-group) approach, which are set out in Section 2.4.3 below.

All Demand Facilities will ultimately be required to demonstrate compliance with MPID345 or achieve a derogation from these requirements, irrespective of which process is followed.

Compliance & Derogation Framework

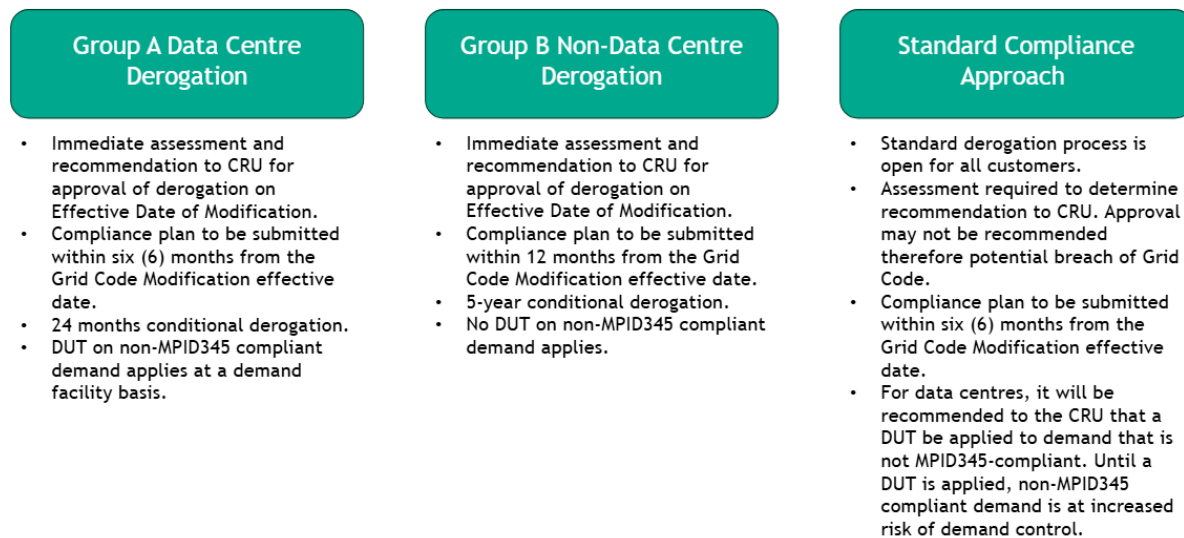


Figure 1 Overview of Compliance and Derogation Framework

The following sections set out the terms and conditions associated with each of these three options.

2.4.1 Group A - Data Centre Compliance and Derogation Process

All transmission connected Data Centre Demand Facilities (either already connected or connecting before the end of 2026) will have the option of a conditional, time-limited derogation as follows:

Time-limited:

- Data Centre Demand Facilities will obtain a 24-month derogation from the MPID345 requirements. This period would commence on the modification effective date (five weeks from the date of CRU approval).
- Any further extension beyond the 24-month period will require a separate derogation application. Any EirGrid recommendation in support of future derogation applications would be subject to EirGrid's assessment of the Demand Facility's progress on achieving compliance with MPID345, as well as further analysis and risk assessment of the power system. Any separate derogation would also require CRU approval.

Conditional:

- The alternative provisions ("Conditions") in respect of any derogation granted in respect of Data Centre Demand Facilities are set out in the Derogation Application Form at Appendix 1 and are summarised below:

1. Demand Utilisation Threshold ("DUT")

1. The portion of demand utilisation at the Demand Facility owner's Demand Facility which is not compliant with the requirements of MPID345 shall be subject to a DUT of a pre-determined MW which shall be applied at the individual Demand Facility.

- i) For the purposes of the Conditions, ‘demand utilisation’ means the actual demand consumed in MW (at the connection point) by a Facility as opposed to the contractual Maximum Import Capacity (MIC).
 - ii) The DUT may be revised by CRU should a material change in circumstances arise in accordance with GC.9.1.4 of the Grid Code
- 2. The Demand Facility owner shall ensure that monthly average demand utilisation of non-compliant demand at the Demand Facility remains at or below the DUT. This requirement for monthly average non-compliant demand utilisation to remain within its DUT is absolute and applies regardless of any temporary peaks (whether those peaks required approval or otherwise).
- 3. The Demand Facility owner shall be permitted to exceed the DUT from time to time and on a temporary basis, subject to the following conditions:
 - i) Notwithstanding (ii) and (iii) below, monthly average non-compliant demand utilisation remains at or below the DUT,
 - ii) Any ‘peaks’ in demand utilisation exceeding the DUT shall not exceed the DUT plus 10 percent (e.g. a Demand Facility with a DUT of 100 MW shall not exceed 110 MW of demand utilisation on a temporary basis), except in the circumstances set out in point (iii) below,
 - iii) Where the Demand Facility owner anticipates a scenario requiring its Demand Facility to exceed the DUT by more than 10 percent (e.g. for testing purposes), the Demand Facility owner shall seek prior written approval from EirGrid and shall not exceed the DUT by more than 10 percent unless EirGrid has provided written approval. Any instance of demand utilisation exceeding the ‘DUT plus 10 percent’ threshold without written approval shall constitute a breach of the Conditions, and
 - iv) Any peak allowance may be revised by EirGrid in accordance with the CRU’s decision on MPID345 should monitoring indicate it is necessary to protect the integrity and security of the power system

2. Compliance Plan

- 1. Within six (6) months from the Grid Code Modification effective date, the Demand Facility owner shall provide to EirGrid:
 - i) a compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of MPID345 (“**Compliance Plan**”) in line with EirGrid’s Guidance Note on Compliance Plans (at Appendix 3), or
 - ii) a justification paper setting out the evidence and rationale if compliance with MPID345 will not be achieved, together with a plan to minimise the extent of non-compliance.

3. Monitoring

- 1. The Demand Facility owner shall facilitate EirGrid’s monitoring of compliance with the Conditions, to include the provision of status reports to EirGrid every three (3) months (and otherwise on EirGrid’s request), outlining Demand Facility owner progress on achieving compliance with MPID345 in accordance with the Demand Facility owner’s Compliance Plan.

2.4.2 Group B - Non-Data Centre Compliance and Derogation Process

The option of a group derogation is available to all transmission connected Demand Facilities that are not Data Centres (either already connected or connecting before the end of 2026). This group derogation will be:

Time-limited

- Non-Data Centre Demand Facilities will obtain 5 year derogation from the MPID345 requirements. This period would commence on the modification effective date (five weeks from the date of CRU approval).
- Any further extension beyond the 5-year period will require a separate derogation application. Any EirGrid recommendation in support of future derogation applications would be subject to EirGrid's assessment of the Demand Facility's progress on achieving compliance with MPID345, as well as further analysis and risk assessment of the power system. Any separate derogation would also require CRU approval.

Conditional

- The alternative provisions ("Conditions") to apply in respect of any derogation granted in respect of Non-Data Centre Demand Facilities are set out in the Derogation Application Form at Appendix 1 and are summarised below.

1. Compliance Plan

1. Within 12 months from the Grid Code Modification effective date, the Demand Facility owner shall provide to EirGrid:
 - (i) a compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of MPID345 ("**Compliance Plan**") in line with EirGrid's Guidance Note on Compliance Plans (at Appendix 3), or
 - (ii) a justification paper setting out the evidence and rationale if compliance with MPID345 will not be achieved, together with a plan to minimise the extent of non-compliance.

2. Monitoring

1. The Demand Facility owner shall facilitate EirGrid's monitoring of compliance with the Conditions, to include the provision of status reports to EirGrid every three (3) months (and otherwise on EirGrid's request), outlining Demand Facility owner progress on achieving compliance with MPID345 in accordance with the Demand Facility owner's Compliance Plan.

The process and expected timelines for the group derogation process is outlined below.

Group Derogation Process - Group A & B

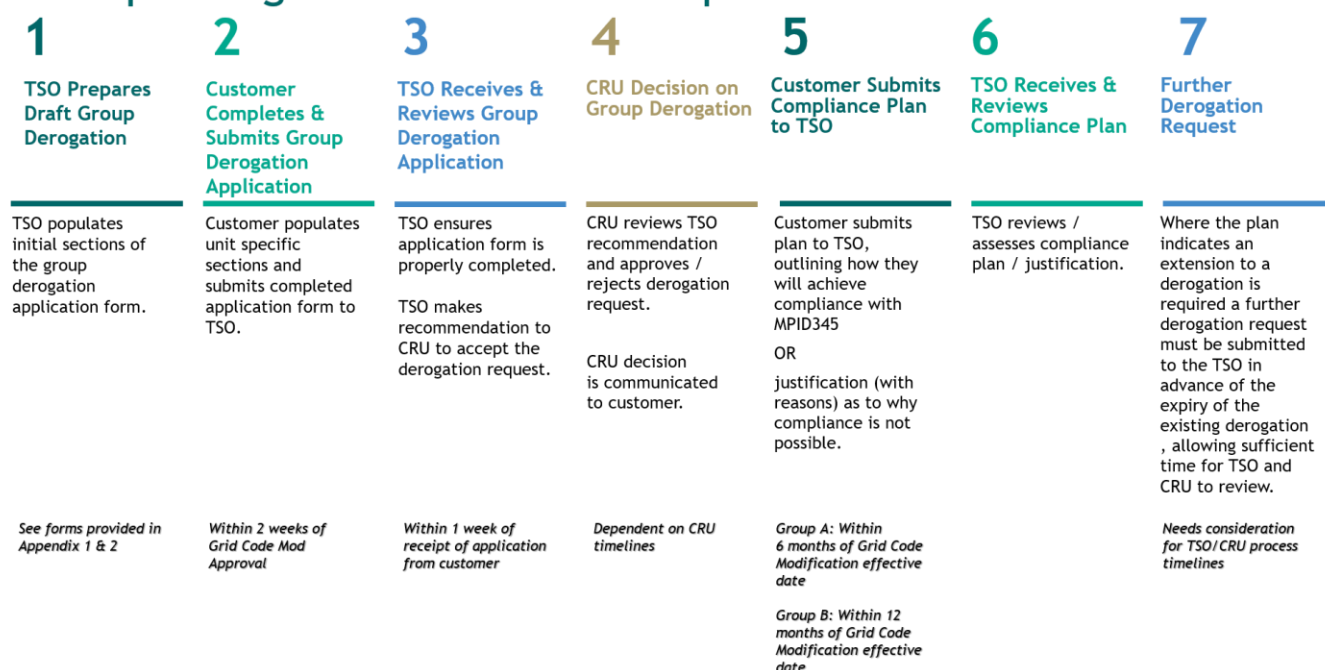


Figure 2 Group A and Group B Derogation Process

2.4.3 Non-Group Compliance and Derogation Process

In addition to the offer of a group derogation to Demand Facilities already connected or connecting before the end of 2026, all Demand Facilities are entitled to follow the standard Grid Code derogation process as set out in Grid Code Section GC.9, and as referred to in paragraph 2.2 above.

A Demand Facility that does not opt in to the ‘group’ derogation process will not benefit from a streamlined recommendation from EirGrid to the CRU that their derogation be approved, subject to EirGrid firstly reviewing each of the group applications to ensure that they are correctly completed and within the requirements of the Framework.

EirGrid will assess each non-group compliance and derogation application on an individual basis and recommend that CRU either approve or reject each individual derogation request. While EirGrid will seek to assess these applications on an expedited basis, and in alignment with the assessment timeline for Group applicants as much as possible, such assessment by EirGrid and then by the CRU may take more time than the group derogation process because these applications do not follow the streamlined approach.

The time required for EirGrid to assess and make a recommendation to CRU on the derogation application will also be dependent on the quality of the applications and information received.

As such, though EirGrid will endeavour to assess all derogation applications in advance of the Grid Code Modification effective date, where a group derogation is not availed of, there is a risk that any non-group derogation application may not be assessed by EirGrid and then by CRU in advance of the Grid Code Modification effective date. There is also a risk that a non-group derogation application may not be recommended for approval by EirGrid or approved by CRU. A Demand Facility that has not received a positive decision on its non-group derogation application from CRU by the Grid Code Modification effective date is non-compliant with the Grid Code. In so far as it does not have a derogation, the Demand Facility’s non-MPID345-compliant demand is at increased risk of demand control.

Any non-group Data Centre derogation application which EirGrid is recommending to CRU will include a recommendation that a DUT is applied to demand that is not MPID345-compliant. The non-group derogation process is outlined below.

Non-Group Derogation Process

1

Customer Submits Derogation Request

Customer submits derogation request to TSO if customer believes that;

1. it would be unreasonable (based on cost and technical considerations) to require customer to achieve compliance with FRT requirements,
- OR
2. customer should be granted extended period to achieve compliance and demonstrates the necessity for this.

Before Grid Code Mod effective date

2

TSO Receives & Reviews Non-Group Derogation Request

TSO ensures application form is properly completed.
TSO makes recommendation to CRU to accept OR reject the derogation request.

N.B.

- EirGrid will recommend to CRU that, for Data Centres, a DUT is applied to non-MPID345 compliant demand
- TSO cannot guarantee derogations sought outside of the 'Group' derogation process will be recommended for approval. Each application will be assessed on its merits, however taking into account overall impact on power system security must be the priority.

Time to review and make recommendation is dependent on quality of plan / mitigants

3

CRU Decision on Non-Group Derogation Request

CRU reviews TSO recommendation and approves /rejects derogation request.

CRU's decision is communicated to customer.

Dependent on CRU timelines

Figure 3 Non-Group Derogation Process

Table 1 summarises the key features of the group and non-group compliance and derogation processes.

#	Area	Group Derogation Process		Non-Group Derogation Process
		Group A - Data Centres	Group B - Non Data Centres	
1	Treatment of Non- MPID345-Compliant Demand Utilisation	Non-MPID345-compliant demand utilisation threshold at a Demand Facility level	No DUT applied.	For Data Centres, it will be recommended to CRU that non-MPID345 compliant demand utilisation have a threshold at a Demand Facility level. Until DUT is applied non- MPID345-compliant demand at increased risk of demand control.
2	Immediate Granting of Derogation on Effective Date of Modification	Yes, for 24 months	Yes, for 5 years	No
3	Compliance Plan as part of Derogation Submission Timeframe (i.e. time to submit plan from Mod. Effective date)	6 months	12 months	6 months
4	Treatment of MPID345 Compliant Demand Utilisation	No restriction on MPID345-compliant demand utilisation up to Contractual Maximum Import Capacity (MIC)		
5	Contractual Maximum Import Capacity (MIC)	Not impacted by this process		

Table 1 Comparison of Group Derogation & Non-Group Derogation

2.4.4 Derogation Application Form

EirGrid has identified GC9-1-Non-Network-Codes-Plant-BESS-or-SCU-Derogation-Application-Form_1 as the most appropriate form of derogation application set out in the Grid Code.

For Demand Facilities following the group derogation process, parts of this form have been pre-populated by EirGrid. Each Demand Facility will need to complete and submit the form should it opt to avail of the group derogation. This pre-populated form is included at Appendix 1 and 2 for reference. Please note the text of the derogation conditions set out in the form.

Demand Facilities following the non-group derogation process should complete the unpopulated GC9-1-Non-Network-Codes-Plant-BESS-or-SCU-Derogation-Application-Form_1 which is available at EirGrid.ie⁴. This form is also included at Appendix 3 for reference.

⁴ <https://www.eirgrid.ie/grid/grid-codes-and-compliance/grid-code#Derogations>

3. Demand Utilisation Threshold

3.1 Overview

A key aspect of the Framework is the setting of a DUT to limit non-MPID345-compliant demand so that the security of the power system can be maintained while Demand Facilities progress towards compliance.

A DUT has been determined for each Data Centre Demand Facility. The DUT sets a fixed monthly average MW limit on non-MPID345-compliant demand at each Data Centre Demand Facility, while allowing some scope for limited peaks above this threshold.

These peaks will be monitored to ensure they are consistent with the security and integrity of the power system. The rules regarding peaks are described in further detail at section 3.2 below.

The DUT may be revised by CRU at any time should a material change in circumstances arise, in accordance with GC.9.1.4 of the Grid Code. EirGrid shall be monitoring and may also revise the rules regarding peaks above the DUT, in accordance with the CRU's decision on MPID345. Data Centre Demand Facilities shall be notified of any such revisions.

Data Centre Demand Facilities which can demonstrate full compliance with MPID345 requirements in accordance with Section 5 below can continue to utilise demand up to their contractual MIC and this MPID345-compliant demand will not be subject to a DUT.

For Data Centre Demand Facilities with demand that is partially MPID345-compliant and partially non-MPID345-compliant, the DUT will apply to the non-compliant portion and the compliant portion will not be subject to a DUT. Note however, for the avoidance of any doubt, that the total demand utilisation of the Demand Facility, comprising compliant and non-compliant demand, cannot exceed the contractual MIC.

This section sets out:

- the rules for DUT application, and
- methodology for determining DUTs.

3.2 Application of the Demand Utilisation Threshold

A DUT has been determined for each transmission connected Data Centre Demand Facility.

A DUT will apply to all Data Centre Demand Facilities seeking a derogation via the Group A process outlined above. For Data Centre Demand Facilities that opt for the non-group derogation outlined in Section 2.4.3 above, EirGrid will recommend to the CRU that a DUT also be applied to their Demand Facility.

The DUT will set a monthly average MW limit on non-MPID345-compliant demand at the Demand Facility. This 'monthly average' approach will allow for temporary peaks above the DUT, provided that:

1. Monthly-Average Compliance (Absolute Limit)

Monthly average demand utilisation of non-compliant demand at the Demand Facility must remain at or below the DUT. This requirement for monthly average demand utilisation of non-compliant demand to remain within the DUT is absolute and is not affected by any temporary peaks described in either point 2 or point 3 below. Demand Facility owners remain responsible at all times for ensuring their MW monthly average demand utilisation of non-MPID345-compliant demand remains within the DUT.

2. Temporary peaks up to +10%

The Demand Facility owner may temporarily exceed the DUT by up to 10 percent without prior approval, provided the monthly average non-MPID345-compliant demand utilisation remains within the DUT.

3. Peaks >10% require prior written approval

Where the Demand Facility owner anticipates a requirement for demand utilisation to exceed the DUT plus 10 percent, they must seek and obtain prior written approval from EirGrid. Once EirGrid approval has been granted, the Demand Facility owner may exceed their DUT by more than 10 percent, provided that the monthly average non-MPID345-compliant demand remains within the DUT.

Example

A Data Centre Demand Facility with a DUT of 100 MW may temporarily peak to 110 MW without EirGrid approval but, should the Demand Facility owner wish to peak in excess of 110 MW (i.e. DUT plus 10 percent) on a temporary basis, they must receive prior written approval from EirGrid to do so. In all cases, their monthly average non-MPID345-compliant demand must remain at or below 100 MW.

For the avoidance of doubt, any exceedance of the 'DUT plus 10 percent' threshold that occurs without prior written approval - whether anticipated, unanticipated, accidental, unintended or caused by operational or equipment issues - shall constitute a breach of the derogation conditions.

Where the monthly average non-compliant demand utilisation of a Data Centre Demand Facility exceeds the DUT for that facility, that shall constitute a breach of the derogation conditions.

3.3 Determining the Demand Utilisation Threshold

The DUT for each Data Centre Demand Facility reflects historic demand utilisation levels (highest monthly-average 2025 demand), plus a pro-rata allocation of any remaining headroom for non-MPID345-compliant demand that can be securely accommodated on the power system.

The following sections set out the methodology that was used for both, determining any potential headroom and how this headroom has been allocated.

3.3.1 Aggregate Power System DUT

EirGrid and SONI have determined a 'Load Rejection' limit for the all-island power system. This is published in EirGrid and SONI's Weekly Operational Constraints Update, the latest version of which can be found on the SEMO website⁵. This represents the limit of instantaneous demand loss for which the power system can be secured for a credible fault event.

This load rejection is the summation of demand losses and any HVDC Interconnector export loss, that could occur for a single credible contingency. To remain within the limit, HVDC exports have been reduced through countertrading between EirGrid / SONI and NESO (the GB electricity system operator).

However, as non-MPID345-compliant demand utilisation continues to increase we will soon reach a position that relevant HVDC Interconnector exports are reduced to zero and the load rejection is entirely made up of demand losses.

Based on model data provided by Data Centres, and EirGrid's simulations of credible power system fault events, we can determine a demand loss factor representing the proportion of Data Centre demand (transmission and distribution connected) that would not ride through a credible fault event. This demand loss factor sets the maximum, aggregate power system level of Data Centre demand utilisation (transmission and distribution connected) that can be accommodated to remain within the load rejection limit (assuming relevant HVDC Interconnector exports are reduced to zero).

3.3.2 Accounting For Distribution Connected Non-MPID345-Compliant Demand

As MPID345 and this Framework applies only to transmission connected Demand Facilities, allowance has been made for the impact of distribution connected Data Centres lying outside these arrangements pending the planned implementation of similar arrangements in the Distribution Code.

⁵ [General Publications | SEMO](#)

We have engaged with ESB Networks to understand the implications of the current and forecast data centre demand at distribution level. This is an input to the determination of the aggregate transmission system DUT.

3.3.3 Accounting For Peaks in Non-MPID345-Compliant Demand

As the DUT is based on a monthly average of demand utilisation, there will be periods when the demand utilisation will peak above this average. To ensure that the overall power system level DUT is not exceeded, a margin to account for peaks has been determined based on analysis of historic aggregate peaks above average demand utilisation levels.

3.3.4 Accounting For New Connections of Non-MPID345-Compliant Demand in 2026

It is assumed that any new transmission connected Data Centre that is currently contracted and expected to be energised during 2026 will not initially be MPID345-compliant and will require a derogation. An allowance for this non MPID345-compliant demand has been made in determination of the aggregate transmission system DUT.

3.3.5 Determining the Aggregate Transmission System DUT

The resulting aggregate transmission system DUT has been determined as the aggregate power system DUT less the distribution connected data centre demand utilisation allowance, less the peak margin, less the allowance for any new Data Centre connecting to the transmission system in 2026.

3.3.6 2025 Data Centre Demand Utilisation

EirGrid's operational demand utilisation data from the calendar year 2025 (30 minute resolution MW Metering data) is used to determine highest monthly average demand utilisation for each Data Centre Demand Facility.

3.3.7 Allocation of the Aggregate Transmission System Headroom across Demand Facilities

Any available headroom between the aggregate transmission system DUT and the aggregate 2025 highest monthly average Data Centre demand utilisation has been allocated on a pro-rata basis across Data Centre Demand Facilities.

Table 2 below summarises the calculations used to determine each Demand Facility's DUT. An illustrative example of the pro-rata allocation of 20 MW of headroom across five demand facilities is also provided in Table 3.

Term	Calculation
Aggregate Power System DUT	= Load Rejection Limit ÷ Demand Loss Factor
Aggregate Transmission System DUT	= Aggregate Power System DUT - Distribution Connected Data Centre Demand Utilisation Allowance - Peak Margin - Future 2026 New Connection(s) Allowance
Aggregate Transmission System Headroom	= Aggregate Transmission System DUT - Aggregate 2025 Highest Monthly Average Utilisation
Demand Facility DUT	= Demand Facility 2025 Highest Monthly Average Utilisation + (Demand Facility 2025 Highest Monthly Average Utilisation ÷ Aggregate 2025 Highest Monthly Average Utilisation) x Aggregate Transmission System Headroom

Table 2 Calculations to determine each Demand Facility's DUT

Demand Facility	Highest Monthly Average Demand Recorded in 2025 (MW)	Demand Utilisation Threshold (MW)	Delta (MW)
A	20.0	21.1	1.1
B	50.0	52.6	2.6
C	60.0	63.2	3.2
D	100.0	105.3	5.3
E	150.0	157.9	7.9
Total	380.0	400.0	20.0

Table 3 Illustrative example of the pro-rata allocation of 20 MW of headroom across five demand facilities

4. Monitoring

4.1 EirGrid will monitor compliance with the Conditions of each derogation. This will include tracking the timely submissions of Compliance Plans in line with specified timeframes. For Group A (Data Centre Demand Facilities), this shall also include monitoring of compliance with (i) the DUT, and (ii) the requirement to seek prior written approval from EirGrid for any demand utilisation peaks more than 10 percent above the DUT. As noted above, any peak allowance may be revised in accordance with the CRU's decision on MPID345 should monitoring indicate it is necessary to protect the integrity and security of the power system. Data Centre Demand Facilities will be notified of any such revisions.

4.2 The process for monitoring compliance with the DUT and peaks is as follows:

1. EirGrid will monitor each Data Centre Demand Facility compliance with their monthly average DUT, and peaks above the DUT on a monthly basis. As stated above, the requirement for Demand Facility owners to remain within their monthly average DUT is absolute, regardless of any temporary peaks (whether those peaks required approval or otherwise).
2. Monthly average demand utilisation of non-MPID345-compliant demand and any peak(s) in demand utilisation more than 10 percent above the DUT for each Data Centre Demand Facility will be determined using metering data (30 minute spot MW data). For the avoidance of doubt, this determination will account for any split in MPID345-compliant and non-MPID345-compliant demand on a Demand Facility basis.
3. EirGrid will cross-reference (i) demand utilisation data at each Demand Facility generally and (ii) demand utilisation data regarding peaks at Demand Facilities greater than 10 percent above the DUT, against permissions sought and granted to Demand Facility owners for peaks above 10 percent of DUT.
4. EirGrid will treat any instance of non-compliant demand utilisation exceeding the DUT on a monthly average basis, non-compliant demand utilisation exceeding the 'DUT plus 10 percent' threshold for peaks without written EirGrid approval as a breach of the derogation conditions.
5. EirGrid will notify Demand Facility owners of the outcome of this analysis within two weeks of the end of each month.
6. Any Demand Facility who seeks to query this analysis shall submit their response to EirGrid within two weeks of EirGrid's notification.

4.3 The process for monitoring compliance plans is as follows:

- Where a Demand Facility has submitted their Compliance Plan and where this Compliance Plan is confirmed to be in line with EirGrid's Guidance Note on Compliance Plans attached at Appendix 4, the Demand Facility owner shall submit a status report every three (3) months (and otherwise in response to an EirGrid request) outlining their progress on achieving compliance with MPID345, in line with the Demand Facility's submitted compliance plan.
- A failure to submit a Compliance Plan (in line with EirGrid's Guidance Note on Compliance Plans) in time will be treated as a breach of the derogation conditions.

4.4 Breach of Alternative Provisions

All derogation applications are sought by a Demand Facility in accordance with the terms of GC.9 of the Grid Code.

In accordance with GC.9.1.3 of the Grid Code, should the derogation be granted by the CRU, the conditions of that derogation shall constitute 'alternate provisions' set forth in a derogation. Non-compliance with the Conditions, or any of one them, constitutes a breach of Grid Code. Under Clause 6.1 of the Transmission Connection Agreement General Conditions of Transmission Connection and Use of System (the "General Conditions"), a breach of Grid Code is deemed to be a material breach of the Transmission Connection Agreement.

Any such breach(es) may result in EirGrid taking measures available to it under the Grid Code and/or under the Transmission Connection Agreement. In this regard, (without limiting EirGrid rights or remedies under the Grid Code or Transmission Connection Agreement or otherwise), General Conditions 8 (Breach of the Agreement) and 9 (Events of Default) particularly 9.1.2 and 9.3, and 22 (De-Energisation under the

Connection Agreement) of the General Conditions, and OC.4.5.6 and OC.6.7.4 of the Grid Code, should be noted.

Separately and/or in the alternative, EirGrid may consider such a breach to be a material change of circumstance in accordance with GC.9.1.4 of Grid Code and request that the CRU initiate a review of the existing derogation, which may for example result in the withdrawal of the Demand Facility's derogation.

Real Time Monitoring and Demand Control Measures

Note that EirGrid will be carrying out real-time monitoring of individual Demand Facility demand utilisation. EirGrid may take immediate demand control action where necessary to protect the integrity and security of the power system.

5. Compliance Assessment

5.1 Overview

In order for a transmission connected Demand Facility to demonstrate compliance with a Grid Code requirement, technical studies (that model the behaviour of the facility in response to simulated events) and/or testing of facilities is typically required. Compliance assessments can be completed by Demand Facilities at any point and submitted to the TSO for review and approval.

In the case of the MPID345 requirements, technical analysis is deemed appropriate given the nature of the requirements, although this analysis may be supported by the Demand Facility's own electrical testing of their equipment. No grid level electrical testing will be undertaken by EirGrid in respect of these requirements.

Demand Facilities will undertake a self-assessment of their compliance with the MPID345 requirements and submit their assessment to EirGrid. EirGrid will then review this submission and notify the Demand Facility owner of its decision with respect to compliance.

5.2 Study Assessment Guides

To support the work of Demand Facilities in assessing their compliance with the MPID345 requirements, EirGrid has developed study assessment guides to inform the modelling and simulation work that should be undertaken and the outputs required. Two study assessment guides have been developed:

1. Fault Ride Through (FRT) / Active Power Recovery (APR) Study Assessment Guide for Demand Facilities
2. Rate of Change of Frequency (RoCoF) Study Assessment Guide for Demand Facilities

Each of these guides sets out:

- Data requirements
- The type of analysis that should be undertaken
- The study methodology that should be followed
- The scenarios (type of faults / events) that should be simulated
- The simulation outputs required

A Demand Facility should submit their self-assessment of compliance to EirGrid. EirGrid will then review their submission, request additional information if required, and determine if compliance has been demonstrated to its satisfaction or not. EirGrid will then notify the Demand Facility of the outcome of this process and next steps. A Demand Facility shall not be deemed or considered to be compliant unless written notification of same is received from EirGrid.

These guides are included as part of this Framework submission to CRU.

5.3 Derogations Register

Under GC.9.3.4.1, the TSO is required to keep a register of all derogations which have been granted and to publish this register on the TSO's website.

EirGrid's Grid Code Derogations Register includes the following information in respect of each derogation:

- DAID number
- Identity of the User that submitted the derogation request

- Plant name
- Applicable Grid Code version, section and clause
- Period of the derogation
- Extent of compliance (which shall include a brief summary of the extent of non-compliance with provision(s) of Grid Code).

6. Appendix 1 - Group A Derogation Application form

The below is the pre-populated group A derogation application. Items highlighted in yellow are for demand facility completion. Each Demand Facility will then need to complete and submit the form. See Appendix 4 for further information on the details required in the compliance plan.

APPLICANT:	Company Name		
APPLICANT CONTACT NAME:	Contact Name	DATE:	dd/mm/yyyy
APPLICANT TELEPHONE NUMBER:	Telephone Number		
APPLICANT POSTAL ADDRESS:	Address Line 2 Line 3 EirCode	APPLICANT E-MAIL ADDRESS:	email@company.com
		DEROGATION APPLICATION NUMBER (EIRGRID USE ONLY)	
GRID CODE VERSION:	18.0		
GRID CODE CLAUSE FOR WHICH DEROGATION IS SOUGHT:	CC7.4.3.1 CC7.4.3.2		
PLANT/ SYSTEM FOR WHICH DEROGATION IS SOUGHT:	Demand Facility Name		
TOTAL INSTALLED CAPACITY (MW)	N/A		
MEC (MW)	N/A		
FINAL OPERATIONAL NOTIFICATION DATE	Connection Date = dd/mm/yyyy		
DATE OPERATIONAL CERTIFICATION ACHIEVED	N/A		
DESCRIPTION AND EXTENT OF NON-COMPLIANCE	The Applicant cannot comply with the new Rate of Change of Frequency (RoCoF), Fault Ride Through and Active Power Consumption recovery requirements outlined in Clauses CC.7.4.3.1 and CC.7.4.3.2.		

IMPACT ON THE ELECTRICITY SYSTEM OF NON-COMPLIANCE	The impact on the electricity system of non-compliance is set out by EirGrid in its information paper https://cms.eirgrid.ie/sites/default/files/publications/MPID345-Large-Demand-Facility-Fault-Ride-Through-Issue-and-Proposed-Solutions-EirGrid-and-SONI-Information-Paper-November-2025.pdf
REASON FOR NON-COMPLIANCE	Applicant's Plant unable to comply with modification #MPID 345 to Grid Code, which introduced Clauses CC.7.4.3.1 and CC.7.4.3.2.
THE END DATE OF THE REQUESTED DEROGATION APPLICATION	24 months from the date on which #MPID345 becomes effective.
EFFORTS MADE TO IMPROVE/ACHIEVE/ MAXIMISE COMPLIANCE AND PROPOSAL FOR REMEDYING NON-COMPLIANCE. PLEASE INCLUDE MILESTONES AND DATES FOR REMEDYING NON- COMPLIANCE, COSTS, AND RISK FACTORS THAT MAY DELAY COMPLIANCE. (THIS SECTION MUST BE FILLED OUT FOR ALL APPLICATIONS)	The Applicant requests an additional period of time to assess the extent of its non-compliance and to formulate a proposal to remedy its non-compliance. The Applicant requests a full derogation from the requirements of Clauses CC.7.4.3.1 and CC.7.4.3.2 for a 24-month period and acknowledges that this will be on a conditional basis. For the avoidance of doubt, this Derogation is sought in accordance with the terms of Section GC.9 of the Grid Code. Conditions The Applicant shall accept and comply with the following alternative provisions as mandatory conditions of any derogation from the requirements of CC.7.4.3.1 and CC.7.4.3.2 ("Conditions"): 1. Demand Utilisation Threshold ("DUT")⁶ a. The portion of demand utilisation at the Applicant's Demand Facility which is not compliant with the requirements of CC.7.4.3.1 and CC.7.4.3.2 shall be subject to a DUT of [XX] MW which shall be applied at the individual Demand Facility. i. For the purposes of the Conditions, 'demand utilisation' means the actual demand consumed in MW (at the connection point) by a Facility as opposed to the contractual Maximum Import Capacity (MIC). ii. The DUT may be revised by CRU should a material change in circumstances arise in accordance with GC.9.1.4 of the Grid Code. b. The Applicant shall ensure that monthly average demand utilisation of non-compliant demand at the Demand Facility remains at or below the DUT. This requirement for monthly average demand utilisation of non-compliant demand to remain within its DUT is

	absolute and applies regardless of any temporary peaks (whether those peaks required approval or otherwise). c. The Applicant shall be permitted to exceed the DUT from time to time and on a temporary basis, provided always that i. Notwithstanding (ii) and (iii) below, monthly average demand utilisation of non-MPID345-compliant demand remains at or below the DUT, ii. any ‘peaks’ in demand utilisation exceeding the DUT shall not exceed the DUT plus 10 percent (except in the circumstances set out in (c)(iii) below), iii. where the Applicant anticipates a scenario requiring its Demand Facility to exceed the DUT by more than 10 percent (e.g. for testing purposes), the Applicant shall seek prior written approval from EirGrid, and shall not exceed the DUT by more than 10 percent unless EirGrid has provided written approval. EirGrid shall treat any instance of demand utilisation exceeding the ‘DUT plus 10 percent’ threshold without written approval as a breach of the Conditions, iv. Any peak allowance may be revised by EirGrid in accordance with the CRU’s decision on MPID345 should monitoring indicate it is necessary to protect the integrity and security of the power system. The Applicant shall be notified of any such revisions. 2. Compliance Plan Within six (6)⁷months from the effective date of Grid Code modification MPID345, the Applicant shall provide to EirGrid: i. A compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of CC.7.4.3.1 and CC.7.4.3.2 in line with EirGrid’s requirements (“Compliance Plan”), or ii. a justification paper setting out the evidence and rationale if compliance with CC.7.4.3.1 and CC.7.4.3.2 will not be achieved, together with a plan to minimise the extent of non-compliance. 3. Monitoring a. The Applicant shall facilitate EirGrid’s monitoring of compliance with the Conditions, to include the provision of status reports to EirGrid every three (3) months (and otherwise on EirGrid’s request) outlining the Applicant’s progress on achieving compliance with CC.7.4.3.1 and CC.7.4.3.2, in accordance with the Applicant’s Compliance Plan.
DETAILS OF SUPPORTING DOCUMENTATION FOR APPLICATION (IF ANY) ATTACHED	N/A

7. Appendix 2 - Group B Derogation Application form

The below is the pre-populated group B derogation application. Items highlighted in yellow are for demand facility completion. Each Demand Facility will then need to complete and submit the form. See Appendix 4 for further information on the details required in the compliance plan.

APPLICANT:	Company Name		
APPLICANT CONTACT NAME:	Contact Name	DATE:	dd/mm/yyyy
APPLICANT TELEPHONE NUMBER:	Telephone Number		
APPLICANT POSTAL ADDRESS:	Address Line 2 Line 3 EirCode	APPLICANT E-MAIL ADDRESS:	email@company.com
		DEROGATION APPLICATION NUMBER (EIRGRID USE ONLY)	
GRID CODE VERSION:	18.0		
GRID CODE CLAUSE FOR WHICH DEROGATION IS SOUGHT:	CC7.4.3.1 CC7.4.3.2		
PLANT/ SYSTEM FOR WHICH DEROGATION IS SOUGHT:	Demand Facility Name		
TOTAL INSTALLED CAPACITY (MW)	N/A		
MEC (MW)	N/A		
FINAL OPERATIONAL NOTIFICATION DATE	Connection Date = dd/mm/yyyy		
DATE OPERATIONAL CERTIFICATION ACHIEVED	N/A		
DESCRIPTION AND EXTENT OF NON-COMPLIANCE	The Applicant cannot comply with the new Rate of Change of Frequency (RoCoF), Fault Ride Through and Active Power Consumption recovery requirements outlined in Clauses CC.7.4.3.1 and CC.7.4.3.2.		

IMPACT ON THE ELECTRICITY SYSTEM OF NON-COMPLIANCE	The impact on the electricity system of non-compliance is set out by EirGrid in its information paper https://cms.eirgrid.ie/sites/default/files/publications/MPID345-Large-Demand-Facility-Fault-Ride-Through-Issue-and-Proposed-Solutions-EirGrid-and-SONI-Information-Paper-November-2025.pdf
REASON FOR NON-COMPLIANCE	Applicant's Plant unable to comply with modification #MPID 345 to Grid Code, which introduced Clauses CC.7.4.3.1 and CC.7.4.3.2.
THE END DATE OF THE REQUESTED DEROGATION APPLICATION	5 years from the date on which #MPID345 becomes effective.
EFFORTS MADE TO IMPROVE/ACHIEVE/ MAXIMISE COMPLIANCE AND PROPOSAL FOR REMEDYING NON-COMPLIANCE. PLEASE INCLUDE MILESTONES AND DATES FOR REMEDYING NON-COMPLIANCE, COSTS, AND RISK FACTORS THAT MAY DELAY COMPLIANCE. (THIS SECTION MUST BE FILLED OUT FOR ALL APPLICATIONS)	The Applicant requests an additional period of time to assess the extent of its non-compliance and to formulate a proposal to remedy its non-compliance. The Applicant requests a full derogation from the requirements of Clauses CC.7.4.3.1 and CC.7.4.3.2 for a 5-year period and acknowledges that this will be on a conditional basis. For the avoidance of doubt, this Derogation is sought in accordance with the terms of Section GC.9 of the Grid Code. Conditions The Applicant shall accept and comply with the following alternative provisions as mandatory conditions of any derogation from the requirements of CC.7.4.3.1 and CC.7.4.3.2 ("Conditions"): 1. Compliance Plan Within twelve (12) ⁸months from the effective date of Grid Code modification MPID345, the Applicant shall provide to EirGrid: i. A compliance plan setting out its detailed proposals and timeline to achieve full compliance with the requirements of CC.7.4.3.1 and CC.7.4.3.2 in line with EirGrid's requirements ("Compliance Plan"), or ii. a justification paper setting out the evidence and rationale if compliance with CC.7.4.3.1 and CC.7.4.3.2 will not be achieved, together with a plan to minimise the extent of non-compliance. 2. Monitoring a. The Applicant shall facilitate EirGrid's monitoring of compliance with the Conditions, to include the provision of status reports to EirGrid every three (3) months (and otherwise on EirGrid's request)

	outlining the Applicant's progress on achieving compliance with CC.7.4.3.1 and CC.7.4.3.2, in accordance with the Applicant's Compliance Plan.
DETAILS OF SUPPORTING DOCUMENTATION FOR APPLICATION (IF ANY) ATTACHED	N/A
Please submit the Derogation Application to derogationrequests@eirgrid.com	

8. Appendix 3 - Non-Group Derogation Application Form

See Appendix 4 for further information on the details required in the compliance plan.

APPLICANT:			
APPLICANT CONTACT NAME:		DATE:	
APPLICANT TELEPHONE NUMBER:			
APPLICANT POSTAL ADDRESS:		APPLICANT E-MAIL ADDRESS:	
		DEROGATION APPLICATION NUMBER (EIRGRID USE ONLY)	
GRID CODE VERSION:			
GRID CODE CLAUSE FOR WHICH DEROGATION IS SOUGHT:			
PLANT/ SYSTEM FOR WHICH DEROGATION IS SOUGHT:			

TOTAL INSTALLED CAPACITY (MW)	
MEC (MW)	
FINAL OPERATIONAL NOTIFICATION DATE	
DATE OPERATIONAL CERTIFICATION ACHIEVED	
DESCRIPTION AND EXTENT OF NON-COMPLIANCE	
IMPACT ON THE ELECTRICITY SYSTEM OF NON-COMPLIANCE	
REASON FOR NON- COMPLIANCE	
THE END DATE OF THE REQUESTED DEROGATION APPLICATION	

EFFORTS MADE TO IMPROVE/ACHIEVE/MAXIMIZE COMPLIANCE AND PROPOSAL FOR REMEDYING NON-COMPLIANCE. PLEASE INCLUDE <u>MILESTONES AND DATES</u> FOR REMEDYING NON-COMPLIANCE, COSTS, AND RISK FACTORS THAT MAY DELAY COMPLIANCE. (THIS SECTION MUST BE FILLED OUT FOR ALL APPLICATIONS)	
DETAILS OF SUPPORTING DOCUMENTATION FOR APPLICATION (IF ANY) ATTACHED	
<i>Please submit the Derogation Application to derogationrequests@eirgrid.com</i>	

9. Appendix 4 - Compliance Plan Guidance Note

The compliance plan should include efforts made to improve, achieve or maximise compliance and proposals for remedying non-compliance. Please include milestones and dates for remedying non-compliance, and any risk factors that may delay compliance.

The table of milestones below includes the minimum level required to be completed for the compliance plan, please provide as much detail as possible. Where additional milestones and/or relevant information is not listed in the below please expand on the table to show the efforts to achieve compliance.

Overview of current compliance position, description of actions taken to date to achieve compliance and overview of plans to become compliant			
Milestone	Provide detail of approach E.g. overview of approach and compliance and risk factors that may delay compliance.	Due Date	Status (Not started/In Progress/Complete)
Implementation of solution - Start Engagement with OEMs - Identify/Develop			
Implementation of solution - Complete Engagement with OEMs - Identify/Develop	<i>Include details on: Who has been engaged with and when</i>		
Implementation of solution: Start Solution Testing			
Implementation of solution: Complete Solution Testing			
Implementation of solution: Start Solution Roll-out			
Implementation of solution: Complete Solution Roll-out			
Submission of Compliance assessment 1 related to Fault Ride			

Through (FRT) / Active Power Recovery (APR)			
Submission of Compliance Assessment 2 related to Rate of Change of Frequency (RoCoF)			
*Additional milestone(s) - please add as required			