DS3 System Services Qualification Trial Process

Consultation Response from



21st July 2016

DS3 System Services Consultation – Qualification Process

This questionnaire has been prepared to facilitate responses to the consultation. Respondents are not restricted to this template and can provide supplementary material if desired.

Please send responses in electronic format to DS3@eirgrid.com or DS3@soni.ltd.uk

Respondent Name	Aoife O'Neill
Contact telephone number	087 9126014
Respondent Company	Bord na Móna

Note: It is our intention to publish all responses. If your response is confidential, please indicate this by marking the following box with an "x". Please note that, in any event, all responses will be shared with the Regulatory Authorities.

Response ☐ **confidential**

Introduction

Bord na Móna welcomes the opportunity to respond to the Transmission System Operators' Consultation on DS3 System Services Qualification Trial Process. Bord na Móna, as a market participant with conventional and renewable assets is fully supportive of the objective behind the DS3 System Services project in achieving an SNSP rate of 75%, ensuring that national obligations and targets are realised by 2020.

With such an evolution of the generation portfolio, the need for the provision of ancillary services becomes more important, as well as the need to procure services from both existing and a range of new technology classes. Bord na Móna welcomes TSO's efforts to facilitate new technologies entry into the market to provide necessary system services with the view of enabling a safe, secure and resilient power system capable of integrating high volumes of non-synchronous renewable generation.

With the transition to I-SEM and prospective continuing low energy prices and the introduction of CRM with reduced remuneration for capacity, Bord na Móna, in common with service providers in general, is acutely aware of the importance of being able to capture secure and adequate revenues from System Services to help underpin the business case for both existing, as well as new investments.

Bord na Móna comments to the specific consultation components are outlined as follows.

Main points:

1. We highlight the need for an adequate number and range of service providers to be trialled; service providers across the different technology classes which are aiming to secure multi-year service contracts need to be afforded the opportunity of being capable of building a business case
2. Measurability trials should be linked to technologies
3. Regarding the proposed evaluation criteria for the selection of participants to take part in the provenability and measurability trials, we propose the TSOs provide more detail on the criteria, which could be agreed through an industry consultation closer to the commencement of the Qualification Trial Process

Consultation on Qualification Process

Question 1: Do you agree that the Qualification Trial Process should focus on both "Provenability" and "Measurability"?

Suppliers of system services need to be reliable when called on to provide these services. System services are necessary for the safe operation of the grid, therefore Bord na Móna agreed that "provenability" is a key accountability of the Qualification Trials.

Delivery of service can only be proven through reliable measurements and therefore we also agreed that "measurability" is a key accountability of the Qualification Trials.

Question 2: Do you agree that the Provenability Trials should focus on proving only two System Services, as representative of all System Services in those categories of System Services?

As provision of reserve (POR, SOR, TOR1) and ramping (RM1, RM3, RM8, TOR2) services are in essence the same services provided over a range of different time frames Bord na Móna is of the view at this time that Qualification Trials for only two of the System Services would likely be sufficient.

Question 3: Do you agree that Provenability Trials should focus on reserve and ramping categories of System Services?

As reserve and ramping services have already been proven under HAS contracts for conventional/traditional providing units and the "Fast Services" are being trialled under the "Measurability" Trials we agree that ramping and reserve should be the focus of the Provenability Trials.

Bord na Móna would in general agree that SIR and SSRP are based on the inherent capability of the technology providing the service and, therefore, Qualification Trials are likely not necessary for these services. However if other service providers believe they are capable of providing these services they should be afford the opportunity to be evaluated for participation in the trials.

Question 4: Do you agree that the technology classes targeted in the Provenability Trials should be wind, demand side and 'other technologies'?

Bord na Móna agrees that the technology classes targeted should be wind, demand side and 'other technologies'.

Question 5: Do you agree that the Measurability Trials should be technology neutral?

Measurability Trials for the "Fast Acting" services should only be technology neutral if they are subsequently followed by a Provenability Trial. If a Measurability Trial is carried out with one service provider (of any technology) to establish measurement standards/criteria, a Provenability Trial for that service should then follow across each technology class.

If Measurability Trials are carried out in isolation then it is not believed that they should be technology neutral. Should Measurability Trials be completed without a subsequent Provenability Trial, then we believe there should be a minimum of at least one service provider from each technology class participating in the Measurability Trials. As demonstrated through the need for Provenability Trials technology classes are inherently different. If a CGGT proves the ability to provide Fast Frequency Response for example this does not prove that wind technologies can also provide this service.

Question 6: Do you agree with the proposed service provision volume and the proposed number of Service Providers to be included in the Provenability and Measurability Trials respectively?

In regards to the Provenability Trials the proposed volumes allow for a number of different service providers to take part in the Trials. This will be of merit to achieve a fair reflection of the ability of the existing generation fleet across each technology.

Considering the Measurability Trials as previously outlined, if used only to establish measurement standards/criteria (and subsequently followed by a Provenability Trial), then one service provider in each jurisdiction should be sufficient to establish the necessary criteria.

However, if the Measurability Trials are being carried out in isolation, then Bord na Móna believes it would be necessary to allow a number of service providers in a number of different technology classes to participate. As the provision of DS3 System Services is such a vital work stream there should be more opportunity for providing units to prove their technical ability. This is to the benefit of both the TSOs and service providers. For service providers which are aiming to secure multi-year service contracts in the Enduring Arrangements it would be difficult to build a business case when only one service provider is being trialled and particularly if they are of a different technology class.

Question 7: Do you agree with the minimum sizes of Providing Unit proposed for the Provenability Trial?

Bord na Móna agree that 1 MW minimum volume is an appropriate amount for providing units to make available for the Provenability Trials for wind and demand side, and would have no issue with the lower level for the other technology trials.

Question 8: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Provenability Trials?

The criteria for Service Providers as outlined for the Provenabilty Trials in principle are reasonable. However Bord na Móna propose, the TSOs provide more detail on the criteria, which could be agreed through an industry consultation closer to the commencement of the Qualification Trial Process.

Question 9: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Measurability Trials?

The criteria for Service Providers to meet as outlined for the Measurability Trials in principle is reasonable. However Bord na Móna propose, the TSOs provide more detail on the criteria, which could be agreed through an industry consultation closer to the commencement of the Qualification Trial Process.

Question 10: Given the stated aims of the Qualification Trial Process, are there different criteria that would better achieve those outcomes than what is proposed here? If so, what are they and how will they work?

At this time Bord na Móna do not have a considered response.

Again we would like to thank the TSOs for the opportunity to respond to the Consultation on DS3 System Services Qualification Trial Process. Finally, if you have any queries or require clarification on any point, please do not hesitate to contact Bord na Móna.

For and on behalf of Bord na Móna



Aoife O'Neill
Bord na Móna Powergen