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

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Respondent Company	*Energia*

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**

The closing date for responses is 21st July 2016

General Comments

Energia welcomes the opportunity to respond to this EIRGRID/SONI consultation DS3 System Services Qualification Trial Process. Energia supports the principles of the DS3 as there is a fundamental need for system services to deliver, and with confidence, for the realisation of renewable targets and associated benefits. Whist we are in the most part supportive of the approach suggested, we have a number of clarifications and questions that we would like to see addressed. Foremost amongst these are the questions surrounding the fact that the provenabilitry trials do not focus on the fast acting services

Question	*Response*
Consultation on Qualification Process	
Question 1: Do you agree that the Qualification Process should focus on both "Provenability" and "Measurability"?	Energia is in broad agreement that the Qualification Trial Process should focus on proving both the reliability of delivering a service and the mechanism for monitoring the delivery. However we have some outstanding queries we would like to see addressed in relation to how this would apply to certain technologies: There are a number of new technologies which have already been commissioned, for example flywheel and battery storage projects. Can Eirgrid confirm if any of these projects have already qualified for ancillary service payments? It would be helpful if Eirgrid would publish a list of all technology types which have qualified for ancillary service payments and whether this means this technology has been proven and is not require to participate in 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?	Energia broadly agrees that the Qualification Trial Process should focus on proving two System Services as representative of all System Services in those categories of System Services. However, we do have a number of points for clarification: Certain Providing Units have been precluded from providing some services in the DS3 Interim Arrangements primarily because they did not have an existing Ancillary Service contract for that service. For example a providing unit could not tender for TOR2 unless it has an existing ancillary service contract with the TOR2 product or evidence of contracted provision of TOR2 in another synchronous system. These Service Providers could currently be providing RRS or RRD. The Qualification Trials will investigate RM3.

	If RM3 will satisfy all the other products in this category (RM1, RM8, TOR2, RRS, RRD) is there any reason why Service Providers were precluded from tendering for TOR2, in the interim arrangements, if they already had RRS or RRD.The interim DS3 arrangements, pre-qualification documentation, required different obligations for (1) providing units with an existing ancillary service contract and (2) those Providing Units wishing to contract for a particular product for the first time. For example the TOR2 requirements for Service Providers who had not contracted the service before, albeit they could be well established technologies, would have to provide real time signalling with sample rate of 0.1Hz or faster. Will there be different treatment between Service Providers depending on whether they have an existing Ancillary Service Contract. a. If any Providing Unit from the same technology class ("Conventional, Wind, Demand Side, Other technologies") has an Ancillary Service contract for a System Service Product, or from any of the 5 different categories, does this mean that the System Service is proven and can be relied on by all System Service Providers with Providing Units in the same technology class. Can Eirgrid publish, for each technology class, all the system services which are currently contracted under an Ancillary Service Agreement. b. The DS3 Interim Arrangements require Providing Units connected to the Distribution System to have formal notification that Operational Protocols will be in place by the relevant DSO/DNO. However there are already Providing Units connected to the Distribution System which are contracted for System Services. Can Eirgrid publish a document summarising what operational protocols which are currently in place and which technology classes these cover. Can Eirgrid confirm if there will be difference made between existing Service Providers and new Service Providers in terms of eligibility to contract being dependent on published operational distribution procedures

	c. Why are there no provenability trials for the fast-acting services? Was this not the initial intent of excluding the three fast acting services from the tendering process? If POR is being measured as part of the provenability trails, why not also include SOR and TOR1. Likewise if measuring RM3, why not measure RM 1 also. Why would POR be considered as being representative of the remaining reserve categories? Are they not all different in terms of response time and MWs? Energia requests that EIRGRID/SONI accepts successful trials of system services on other systems as evidence of provenability.

Question 3: Do you agree that the Provenability Trials should focus on the Reserve and Ramping categories of System Services?	The DS3 Interim Arrangements precluded Providing Units connected to the Distribution Network from being eligible for SSRP. We believe, in particular, that Providing Units which are connected to the distribution network when there is no demand connected on the distribution network on this side of the distribution/transmission substation should not have been precluded from the DS3 Interim Arrangements. In particular cluster sub-stations in Northern Ireland and in ROI. We believe that this pre-qualification requirement should be removed and SSRP should be included in the Provenability testing for all other distribution connected Providing Units. Similar to Q2, the focus on the provenability trials should be on the fast acting products. Similar to our response in question 2 why has fast acting services not been included? And why is reserve being included, is this not covered by grid code? Why not include fast-acting services also? The eligibility requirements for TOR2 in the DS3 arrangements, for those Service Providers not currently contracted for TOR2, required at least 20 Active Power Dispatch Instructions in another Synchronous System. For existing generating units connected to the system this requirement should be replaced with 5 Dispatch Instructions on the all island network.
Question 4: Do you agree that the technology classes targeted in the Provenability Trials should be wind, demand side and 'other technologies'?	Can Eirgrid confirm that if Providing Unit which does not currently provide a particular System Service, and the Providing Unit is not one of the proposed technology classes, the Service Provide will be able to tender for the system service in future procurement exercises without being ruled out because it does not have an existing ancillary service contract. For example if a conventional generating unit does not currently provide POR however is capable of providing the same.

Question 5: Do you agree that the Measurability Trials should be technology neutral?	Energia agrees that measurability trials should be technology neutral.

Question 6: Do you agree with the proposed service provision volumes and proposed number of Service Providers to be included in the Provenability and Measurability Trials respectively?	In the Provenability Qualification Trials the total volume should be split between different sub categories of the technology class if Eirgrid are proposing to differentiate between different designs, for example different designs of wind turbines or battery types. If this differentiation is going to be made potentially larger volumes should be trialled. Furthermore, what is the basis for determining that 80MW are required in NI and ROI?
Question 7: Do you agree with the minimum sizes of Providing Unit proposed for the Provenability trials?	On the Minimum Size requirement is this based on an aggregated volume from Demand Side / Aggregated Generating Units or at an individual level?

Question 8: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Provenability Trials?	Energia agrees with the evaluation criteria however, we would have concerns over Eirgrid trialling any products which have been developed internally and would compete with products being developed by the industry (for example demand reduction schemes) this would represent a material conflict of interest. Furthermore, It is not clear how the participants will be selected, whether this is based on lowest cost or not? For some of the technology classes they are likely to be operating at their maximum potential output during the trial period (for example wind). Will the TSO constrain down, with full compensation, this type of service provider to demonstrate the capability to provide reserve and ramping products.
Question 9: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Measurability Trials?	Again, it is not clear how the participants will be selected. What happens if there are no events during 3 month period, e.g. no voltage drop for FPFAPR or DRR. Finally, how was the €25,000 per service arrived at?

Question 10: Given the stated aims of the Qualification 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?	No comment at this point.