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Datum: 06-07-16

Re: Response to „Consultation on DS3 System Services Qualification Trial Process“

Dear Sir or Madam,

Please find our response to „Consultation on DS3 System Services Qualification Trial Process“ below.

Kind regards / Saludos / Sinceramente / 恳切地

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We as a manufacturer of energy storage systems and grid support systems welcome the opportunity to provide feedback to the above mentioned consultation paper.

On a general note, we think that the consultation paper leaves some questions that need clarification. In chapter 1.1. it is stated: "*The Qualification Trial Process is the mechanism by which **new unproven technology providers** of System Services can ultimately gain access to the next available Central Procurement Process*".
In chapter 2.5. it is stated: "*The overall objective of the Qualification Trial Process are to **enable unproven technologies** to prove their system service capabilities and to facilitate participation in the next Central Procurement Process*".
The statement in the first chapter relates to **technology providers**, the similar statement in chapter 2 relates to **unproven technologies**. This raises the question: Will technology providers that do not participate in the Qualification Trial Process have a disadvantage in gaining access to the next available Central Procurement Process? Or will the chosen participants represent the respective technology category and subsequently all technology providers of this category gain access to the Central Procurement Process on a level playing field? This is a general point that needs clarification.

Having said that, we do agree with most questions (answering „yes"), except question 6 and question 10. Therefore we only comment on question 6 and question 10 below.

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?

If the participation in the Qualification Trial Process gives advantages to the individual service provider in gaining access to the Central Procurement Process (see comments above) we think the number of allowed service providers in the Measurability Trials should be higher.

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?

We think that the Qualification Trial Process should also allow for „Test Bench Results" if the technology provider`s test bench has the ability to create real grid events (island grid with full power converter). The results could be approved by an acknowledged certification body. This would also give more certainty to the Grid Operator. (The numbers in chapter 2.4.1. already indicate that the objectives for the real life test might be too ambitious: If there are 8 to 10 events per year, not evenly spaced out on a month-by-month basis, it might be difficult to achieve 5 events in 6 month).

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