

Response to Consultation on

DS3 System Services Qualification Trial Process

21st July 2016

On behalf of Indaver Ireland Ltd

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	*Joe Crawley*
Contact telephone number	*+353 (0) 41 2134014*
Respondent Company	*Indaver Ireland Ltd*

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

Indaver welcomes the publication of the DS3 System Services Qualification Trial Process consultation document and the opportunity to provide comments on the issues raised. Indaver would like to submit the following response to the transmission system operators, EirGrid and SONI.

Indaver Ireland, a wholly owned subsidiary of Indaver NV, was established in 1999 to develop waste infrastructure in Ireland. Indaver Ireland limited owns and operates the 17 MW Meath Waste to Energy plant and is developing further infrastructure in Ireland to build upon its worldwide portfolio. The responses to this consultation are therefore conditioned by the nature of our current position and portfolio of assets operating in the SEM.

With the transition to I-SEM, and the inherent uncertainty, Indaver, in common with the electricity industry in general, is acutely aware of the importance to providers of being able to capture secure revenues from System Services to help underpin the business case for both existing, as well as new investments. We are also conscious of the role and responsibilities of the TSO, the need to deliver value to the consumer, and ultimately in providing a power system which is both sustainable and secure at these levels of non-synchronous penetration.

Summary of Consultation Questions

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

Indaver believes that it is appropriate to focus on both "Provenability" and "Measurability" in the Qualification Trials process as this will facilitate a full range of system service products and providers participating in the second year of the Interim Arrangements and Enduring Arrangements of the DS3 programme.

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?

Indaver can already provide the aforementioned services and will not participate in the Provenability Trials.

Question 3: Do you agree that the Provenability Trials should focus on the Reserve and Ramping categories of System Services?

Indaver can already provide the aforementioned services and will not participate in the Provenability Trials.

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

Indaver can already provide the aforementioned services and will not participate in the Provenability Trials.

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

Indaver disagrees that the Measurability Trials should be technology neutral as the measurability of synchronous and non-synchronous Providing Units may be inherently different. Indaver understands that the fast acting services are aimed primarily at non-synchronous technology but allowances should be made for synchronous generators that may have the capability of providing these services, in

particular Fast Frequency Response (FFR). Fast acting flexible CHP units have the potential to provide these services in a secure and predictable nature and should be considered when establishing the measurability metric and systems.

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?

Indaver agrees with the volume allocation for the Provenability Trials as it allows a substantial number of providers to participate in the process.

Indaver believes that the proposed number of Service Providers included in the Measurability Trials is very limited. As stated above, different measurement techniques and systems may be proposed by different technologies and Service Providers. The consultation document states that providing units may be able to participate across all three trials. This means that potentially the trials will only prove the measurability of these products from one specific technology (in each jurisdiction) which may not apply across all ranges of providers. Indaver proposes that the number of service providers is increased for each trial particularly for the Republic of Ireland which is a bigger market than Northern Ireland. Alternatively a guarantee of at least three Service Providers in each jurisdiction should be procured to participate in the Measurability Trials with each provider having an option to provide at least one but up to three of the system services.

Indaver believes that the proposed trial format in the consultation paper limits the potential solutions for measuring the fast acting services.

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

Indaver agrees with the minimum sizes of Providing Unit proposed as they are in line with the volume restrictions in the Interim Arrangements.

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

Indaver can already provide the aforementioned services and will not participate in the Provenability Trials.

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

Indaver broadly agrees with the proposed evaluation criteria although it may be prudent to observe performance in at least two events during the trial period to confirm accuracy of provision.

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?

Indaver broadly agrees with the criteria proposed in the consultation document.