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	*Moyle Interconnector 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**

The closing date for responses is Tuesday, 19 July 2016.

Question	*Response*
Consultation on Qualification Process	
Introduction	Moyle Interconnector Ltd ('Moyle') has been a provider of sub-second response reserve services under the HAS regime and has submitted a tender for certain services in the DS3 system services interim arrangements. Moyle has also been trialling Frequency Limit Control, a dynamic response to frequency deviation, with SONI. Since the current tender does not cover the sub-second reserve (FFR) that Moyle has provided to date we welcome any word on arrangements that address provision of such a service. We note that, besides the current tender for eleven system services, on the fast services the TSOs have stated "We will therefore only contract with a subset of eligible providers for these three services."(1) In the same paper the TSOs stated "We will also need to be able to measure the quality of provision of "fast" services i.e. Fast Frequency Response (FFR) […]. We propose to explore this during the interim phase using technology trials." (1) It is therefore unclear to us whether the fast service currently provided by Moyle until termination of the HAS contract will be the subject of a new DS3 system services contract outside the current tender or whether that service, which has been successfully delivered for many years, will now be the subject of a qualification trial. It is our understanding that without a contract the fast service may not be available to the TSOs. Our remarks in response to this consultation are based on the assumption that the fast service provided by Moyle would be the subject of a qualification trial. We offer responses to [some of] the specific consultation questions below. (1) - EirGrid and SONI – Consultation on DS3 System Services Interim Tariffs, 8 April 2016.
Question 1: Do you agree that the Qualification Process should focus on both "Provenability" and "Measurability"?	These characteristics appear to be appropriate, subject to the following responses.

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?	We understand from the consultation paper that the TSOs propose to evaluate performance against POR and RM3 only, in the reserve and ramping categories respectively. On the reserve products in particular, we doubt that all units capable of delivering POR have the capability to delivery SOR and TOR1 also, since the delivery duration is much longer. Energy limited units especially might not be able to sustain the required response. For example, if a unit becomes 'proven' in a POR provenability trial it would also be deemed 'proven' for SOR, TOR1. If the unit is then in fact unable to deliver longer lasting services under a SOR, TOR1 contract it would be penalised under the performance scalar (perhaps the TSOs consider that to be a sufficient self-selection measure), but importantly the capability available on the system to the TSOs would be reduced.
Question 3: Do you agree that the Provenability Trials should focus on the Reserve and Ramping categories of System Services?	It is not generally clear from the consultation paper how a unit could become 'proven' for the fast acting services (provenability trials are proposed for reserve and ramping, while SIR, SSRP are inherent characteristics). However, table 3 suggests that 'measurability' trials of the fast services will provide qualification of both measurability approach and technology class. This appears to imply proving the technology class, as in a provenability trial. We would welcome that approach. Otherwise, there should be specific provenability trials for the fast services.
Question 4: Do you agree that the technology classes targeted in the Provenability Trials should be wind, demand side and 'other technologies'?	We acknowledge that wind and demand side are large groups of existing potential providers, but certainly the TSOs should include significant space for 'other technologies'.
Question 5: Do you agree that the Measurability Trials should be technology neutral?	Yes, measurability trials should be technology neutral. The objective should be to verify measurability and deliverability, not constrained to specific providing technology.
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	In the provenability trials we agree that a substantial volume should be available for 'other technologies'. In the measurability trials, we suggest that it would be advantageous to trial more than one provider in each jurisdiction. We understand (see response to Q3) that a measurability trial will qualify both measurability approach and technology class. Constraining the measurability trial for a specific service to one combination of technology and measurement approach (per jurisdiction) would limit the qualified measurement and technology classes available to the

respectively?	TSOs. It would also limit potential providers' selection of qualified measurement approaches.
Question 7: Do you agree with the minimum sizes of Providing Unit proposed for the Provenability trials?	No comment.
Question 8: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Provenability Trials?	Besides setting an upper and lower limit to the volume that might be trialled, we do not see that the consultation document describes how competing requests to participate in provenability trials will be evaluated against each other. Providers are asked to specify how the service will be provided, a volume, monitoring arrangements and price, but it is not clear how these factors will be evaluated, weighted, etc. Clear evaluation criteria are essential to ensure optimal selection of participants, as these trials are potentially of significant value to providers and the TSOs.
Question 9: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Measurability Trials?	We do not see that the consultation document describes how competing requests to participate in measurability trials will be evaluated against each other. Providers are asked to specify how the service will be measured, verified, commercial terms, but it is not clear how these factors will be evaluated, weighted, etc. Clear evaluation criteria are essential to ensure optimal selection of participants, as these trials are potentially of significant value to providers and the TSOs.
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.