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	*PowerNI PPB*

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	
Question 1: Do you agree that the Qualification Process should focus on both "Provenability" and "Measurability"?	PPB agrees that it is important that all new technologies and products are trialled to ensure compliance is possible prior to entering into a contract. We also agree with the decision to focus on "Provenability" and "Measurability". It is important that all technologies, new, existing and already connected trials (e.g. battery storage and flywheels) are all treated in the same manner and required to go through the same rigour of testing prior to receiving DS3 contracts.
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?	This is a sensible approach but must not be rigidly adhered to. If a technology type can only provide SOR and TOR, it should still be eligible for participation in a trial. It is important that technologies are not discriminated against if they can provide other products and are wishing to participate in the trials such that they can access contracts for the services they can provide.

Question 3: Do you agree that the Provenability Trials should focus on the Reserve and Ramping categories of System Services?	We have no objection to this approach.
Question 4: Do you agree that the technology classes targeted in the Provenability Trials should be wind, demand side and 'other technologies'?	Any new and untested technology should be afforded the opportunity to trial, albeit these will most likely fall within the suggested categories. It is however unclear once a technology class is proven and measurable whether that also means that all other technology types in the same class are also proven e.g. the proving of one type of demand side technology is considered representive of all others or does each type of demand side technology/activity need to trial separately? If separate trials are required then each should be allowed to participate at this stage without restriction or limitation.

Question 5: Do you agree that the Measurability Trials should be technology neutral?	We agree, however we believe the TSO should specify what is acceptable in relation to the measuring equipment since otherwise participants may invest money and effort only to be told by the TSOs at a later date that some other parameter is required to be measured. This area of measuring is already not operating on a level playing field with the measurement equipment in Northern Ireland operating to a greater degree of accuracy than that in RoI. This is discriminatory. All providers of DS3 products should be required to have the same standard of equipment prior to entering into DS3 contracts. As mentioned above Northern Ireland has had fast acting event recorders operating and proven for many years and with data readily available for many historic events. Is measurability not therefore already proven in NI?
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?	This should be flexible to include different technologies within each class as it is important that all technologies get an equal opportunity to test if they are in a position to do so. There should be no restrictions applied unless there is clear agreement that the testing of one technology (or sub-set thereof) in a particular class is sufficient to enable all others in the same class to become proven.

Question 7: Do you agree with the minimum sizes of Providing Unit proposed for the Provenability trials?	Yes, we agree.
Question 8: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Provenability Trials?	It is not possible to answer this as the paper does not provide any criteria against which assessment of the units applying for participation will be assessed. The paper only lists what must be provided, it doesn't explain how the provider(s) will be selected if there are too many applicants. However it is important that EIRGRID projects do not take the trial slots in these tests and so prevent other providers having the opportunity. All other providers should take precedence. This pre-qualification trial criteria for Provenability is not sufficient to prove compliance. The constantly changing dynamics of the electricity system with differing levels of wind, thermal generation and interconnection as well as demand variations will not be sufficiently tested in 5 events, particularly for new units who will still be learning about the response of their unit under stress conditions. A conventional, well established unit would not be happy to base their

	performance over this few events therefore we do not consider it prudent for the TSO to accept a new unit to provide an extremely important service without rigorous testing (including their potential impact on existing service providers).
Question 9: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Measurability Trials?	It is not possible to answer this as the paper does not provide any criteria against which units applying for participation will be assessed. The paper only explains what must be provided and that there is no maximum and minimum size requirement, it doesn't explain how the provider will be selected if there are multiple applicants. As previously mentioned the TSO should be stating how the services should be measured to meet their requirements and how they plan to independently verify this data. The TSO needs to know what to expect and what standard of data is required to provide confidence that the service and its Measurability is adequate for purpose.
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	It is important that all units entering this trial are Grid Code compliant. The Interim Tariffs published in the DS3 Interim Tariffs paper does not incentivise existing providers to make available the DS3 services due to reductions in revenue from the current HAS arrangements therefore the monitory value of these products will be unlikely to incentivise new providers who are developing equipment as these costs may not be deemed profitable. To participate in a trial to help move DS3 forward and risk no monitory

how will they work?	benefit will not encourage the required trial providers. It is vital that the TSO is confident in the provision of these DS3 products from new technologies as the reliance on new technologies will reduce the requirement for tried and tested technologies and the TSO must be sure that provision of each product is certain when there will be few other units for back-up. It is also important that no provider is getting paid for services they cannot provide on a regular and consistent basis. For example if it is only considered prudent for the system operators to schedule 40% of POR to non-conventional units then they should be paid in a similar manner.