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	Schwungrad Energie 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	
Question 1: Do you agree that the Qualification Process should focus on both "Provenability" and "Measurability"?	Yes The development of "new codes and standards for new technologies" should include Grid codes. Using the windfarm grid code is not apprpropriate for some of the new technologies such as dynamic storage.
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?	It is a rather limited approach and the consequences lead to some significant restrictions. One problem is that TOR2 is included with ramping. If it were categorised as a reserve, the proposed approach might be OK. Much dynamic storage can provide TOR2 (20min) but cannot provide RM3 (sustain output for 5 hours) and so will not be able to prove the Ramping category. Does that mean that it will not be proven for TOR2 and the plant will not be able to offer TOR2 as a service even though it can offer POR, SOR and TOR1?
Question 3: Do you agree that the Provenability Trials should focus on the Reserve and Ramping categories of System Services?	No. Many technologies can also provide Fast-acting services but these will only be proven if these same plants are also selected for measurability trials**. It is essential that all the categories that a plant can provide are proven if that is required for the plant to be given a contract for those services by EirGrid.** Otherwise the plant may not be economically viable if it can only contract for and be paid for some services but not all services that it could provide.
Question 4: Do you agree that the technology classes targeted in the Provenability Trials should be wind, demand side and 'other	Yes. However, in the case of "Other", it is not clear what "technology" is being proven. If a particular type of battery is proven, say Li-ion, does that cover all battery types or only Li-ion. If the latter, does it cover all types of Li-ion? If a technology from a particular manufacturer is proven, does that cover that technology from all manufacturers?

technologies'?	
Question 5: Do you agree that the Measurability Trials should be technology neutral?	It could also align with the Provenability trials which may be more efficient and would also facilitate proving some Fast-acting services for the same plants. See answer to Q3 above.
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?	Yes.
Question 7: Do you agree with the minimum sizes of Providing Unit proposed for the Provenability trials?	Yes
Question 8: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Provenability Trials?	The evaluation criteria are too vague. Do they include only the 3 bullet points or also the scope of work and project plan? It is not clear how each will be evaluated i.e. what is EirGrid looking for and what is of value to EirGrid under each point. The weightings for each criteria also need to be specified. Price should not be a criteria for these trials. All successful projects should receive the tariff prices. The amount of money is not significant to EirGrid. Furthermore it gives an advantage to incumbants and large companies over start-up companies which have innovative technologies.
Question 9: Do you agree with the proposed	Same comments as Q8

evaluation criteria for the selection of participants to take part in the Measurability Trials? **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?**	**Provenability** 1. Will the plant be available for testing from Jan 2017? (Pass/Fail) 2. Planning permission/connection/tax compliance/other legal requirements (Pass/Fail) 3. What system services can be provided by the technology – list. (35%) 4. Typically what availability can be provided? Are there any limitations? Does the provision of any service restrict the provision of any other service? (10%) 5. How will the performance of the plant be monitored? (10%) 6. Can this plant also be part of the Measurability trial. (5%) 7. Can this plant cover provenability of more than one technology (10%) 8. How quickly could a commercial sized plant be provided? (30%) **Measurability** 1. Will the plant be available for testing from Jan 2017? (Pass/Fail) 2. Planning permission/connection/tax compliance/other legal requirements (Pass/Fail) 3. How will the performance of the plant be monitored? (55%) 4. Can this plant also be part of the Provenability trial? (15%) 5. How quickly could a commercial sized plant be provided? (30%)

Critical Issues

1. It is not clear what "technology" is being proven. If a particular type of battery is proven, say Li-ion, does that cover all battery types or only Li-ion. If the latter, does it cover all types of Li-ion? . If a technology from a particular manufacturer is proven, does that cover that technology from all manufacturers?
2. It is essential that all the system services categories that a plant can provide are proven if that is required for the plant to be given a contract for those services by EirGrid**.** Otherwise a plant would have to be successful in a further trial before it could bid in and win a contract with EirGrid to provide its full range of system services. It is unlikely to be commercially viable unless it can contract for and be paid for all the services it can provide.

3. The evaluation criteria are too vague. Do they include only the 3 bullet points or also the scope of work and project plan? It is not clear how each will be evaluated i.e. what is EirGrid looking for and what is of value to EirGrid under each point. The weightings for each criteria also need to be specified.
4. Price should not be a criteria for these trials. All successful projects should receive the tariff prices. The amount of money is not significant to EirGrid. Furthermore it gives an advantage to incumbants and large companies over start-up companies which have innovative technologies.
5. Alternative evaluation criteria are suggested.