SIEMENS Energy

Eirgrid Plc.,
The Oval,
160 Shelbourne Road,
Ballsbridge,
Dublin 4.

Name Brian O'Doherty
Department Wind Power and Renewables
E-mail brian.o_doherty@siemens.com
Date 21st June 2016

Reference: Consultation on DS3 System Services Qualification Trial Process

Dear Sir/Madam,

Thank you for your opportunity to provide feedback on the proposed approach to the DS3 System Services Qualification Trial Process. Siemens is very interested in utilising its engineering expertise to provide additional services and products to our customers in the Irish market. This will also support the grid to allow more renewable generation to connect to the network over time. The proposed trials are a necessary step in the process of bringing these services to market in a safe and fair manner. This consultation indicates an inclusive and transparent approach to this process that will serve all parties well.

In general we find that the outlined process is reasonable, practical and well considered. We have provided more detailed commentary on each of the questions raised in the consultation document in the attached notes.

As always, we would be happy to discuss this with you at any point and provide input where you feel it will be valuable.

We look forward to working with you on this in the future,

Yours sincerely,

Brian O'Doherty
Proposal Manager

Thomas Mousley
Commercial Manager

Siemens responses to the questions outlined in the consultation document

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

We agree that it is necessary to focus on both "Provenability" and "Measurability", particularly "Measurability" which has not received significant attention to date.

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?

See response to Question 3.

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

We have combined our answer to Questions 2 and 3. Each of the different system services have different challenges with regards to "Provenability" and "Measurability". We would suggest that it would be beneficial to identify the critical aspects in terms on "Measurability" and "Provenability" for each and put them into the trials as well.

–

For example FRR – in general it is important how to measure this service but there are also elements of the provenability which may need to be considered, especially the post event power drop, i.e. how long and how deeply it can be sustained and how can it be influenced. This is of particular because there as the wind changes it becomes difficult to measure and evaluate this performance.

To provide another example, for DRR we would not focus on the provision of reactive power as this can be calculated quite accurately. Instead we would suggest focusing on the rise time / settling time of the reactive current as this is less well understood.

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

Yes, we agree.

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

In principle, we agree. However the changing nature of wind conditions can have a signficiant impact on "measurability" so it might be useful to retain the flexibility to split the trials into different technologies if there is a practical need to do so as the details are explored further.

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?

The 3 services under the "Measurability" Trials might be quite differently provided from Wind, Demand Side and other technologies. For example both FPFAPR and DRR are well understood for wind - including the challenges on the mechanical system and measurability. But these services may not be as well understood from the other technologies point of view so a split into the different technologies might be useful, as per the provenability trials. This would appear to be more useful than the split along jurisdictional lines as the measurement methodology will probably not change with the location of the Providing Unit.

There is a lack of clarity in the central paragraph on page 11. It is not clear to us how a Providing Unit will become eligible to participate in the Measurability Trials which we understand are a subset of the Qualification Trial Process. There is further detail in Section 2.4.2 but no explanation of how Service Providers will be selected if more than one meets the criteria outlined.

Siemens Ltd.
Registered in Dublin, Ireland
Registered No: 7347
Vat Registration No. IE8Y49352A
WEEE Registration Number: IE 00075WB
Directors: G.O'Callaghan (Chairman and CEO), K.Bolton (CFO).

Old Finglas Road
Glasnevin
Dublin 11
Ireland

Tel.: +353 (1) 216 2000
www.siemens.ie

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

No comments.

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

No comments.

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

No comments.

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?

No comments.

Siemens Ltd.
Registered in Dublin, Ireland
Registered No: 7347
Vat Registration No. IE8Y49352A
WEEE Registration Number: IE 00075WB
Directors: G.O'Callaghan (Chairman and CEO), K.Bolton (CFO).

Old Finglas Road
Glasnevin
Dublin 11
Ireland

Tel.: +353 (1) 216 2000
www.siemens.ie