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	*WFSO*

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, WFSO agree with focusing on proving and measuring the services, however we also believe that given the nature of the distribution system protection settings in comparison to the transmission system it would be prudent to run integration testing on both electrical networks for each class.
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?	Yes WFSO agree with this approach.

Question 3: Do you agree that the Provenability Trials should focus on the Reserve and Ramping categories of System Services?	Yes WFSO agree with this approach.
Question 4: Do you agree that the technology classes targeted in the Provenability Trials should be wind, demand side and 'other technologies'?	Yes WFSO agree with the technology classes but also suggest an additional class wherein a mix of technologies can exist behind the one point of connection, for example; supplementing a wind farm with "other technologies" to provide the fast acting services. This may also prove advantageous considering particular constraint groups and the possibility of "other technologies" positively affecting the power being generated at that WF POC.

Question 5: Do you agree that the Measurability Trials should be technology neutral?	WFSO disagree with this suggestion as different technologies can implement different power delivery profiles. The selection criteria should differentiate between achievable ramp rates, taking into account static and dynamic responses and how they will interact with either the distribution or transmission system. Also, given the potential variability in power delivery profiles (dynamic, static, droop, ramp rates etc.) from each class, WFSO suggest de-scaling the events and analysing the response in each and every possible power delivery mode, opposed to one single event. If the outcome of the measurability trials is a method by which to quantify and measure the response then WFSO see no reason not to de-scale the events in order to expedite the process.
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 WFSO agree with the proposed service provision volumes and proposed number of service providers, however it is also suggested that each volume and service provider is integration tested on both the transmission and distribution networks.

Question 7: Do you agree with the minimum sizes of Providing Unit proposed for the Provenability trials?	Yes WFSO agree with the minimum sizes of providing units, however WFSO also suggests special grid connection dispensation to allow direct connection into the distribution network for sub 500kW other technology systems.
Question 8: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Provenability Trials?	WFSO recommends defining a set of desired responses (static, dynamic, ramping, droop etc.) as the pass criteria opposed to 5 events, and then de-scaling the events to expedite the process if necessary.

Question 9: Do you agree with the proposed evaluation criteria for the selection of participants to take part in the Measurability Trials?	Yes WFSO agree with the proposed evaluation criteria for the selection of participants to take part in the measurability trials but also believe that sub 500kW other technology systems should be afforded special grid connection dispensation to allow direct connection into the distribution network for 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?	WFSO agree with the stated aims but are of the opinion that grid integration testing and power delivery profiles should also form part of the measurability and provenability criteria.