

DS3 System Services Consultation – Volume Capped Procurement

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	<i>PowerNI PPB</i>

Note: It is the TSOs' 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

Question	Response
Proposed Market Ruleset	
<p><u>Question 1:</u> Do you have any comments on the two options for service bundling proposed and the TSO's preferred option?</p>	<p>PPB have no strong views on these two options, but we note the requirement for the TSOs to be able to dispatch the TOR1 and TOR2. TOR1 and TOR2 are defined in the Grid Code as a response to an Event so should only be called upon under these circumstances.</p>
<p><u>Question 2:</u> Do you have any view on the technical requirements proposed, including the requirement for over-frequency response?</p>	<p>Our view is that over-frequency is a new product and the TSOs have concluded there is an increasing requirement for it and so it should be introduced as a separate product and properly remunerated.</p> <p>The TSOs should not be trying to add it into the existing reserve products as it requires providers to carry out additional work and incur additional investment [and O&M] costs.</p> <p>We believe that all providers should be treated equally and so all potential providers should have the option to offer the service and be remunerated for it.</p> <p>It is also important that these new technologies do not increase the frequency and/or scale of over frequency situations and leave the few conventional units that are still connected to compensate for the capped providers lack of response and with no additional payment for doing so.</p>
<p><u>Question 3:</u> Do you have any comments on the availability obligation proposed?</p>	<p>It is not entirely clear how this availability obligation would work. However we agree that these high availability units must not be claiming payments for services which are not available and this is a concern when they will be infrequently called upon. It is important that this availability is tested other than through reliance on frequency transients as such events are not sufficiently regular. It is also important that if these units declare their capability down and that they are penalised under the GPIs in the same manner as other units who are providing these services.</p>

