DS3 System Services - Interim Performance Scalar Calculation Methodology - Consultation Paper

Moyle Interconnector Ltd Response

May 2017

The Moyle Interconnector has for many years provided valuable reserve support to SONI through DS3 system services interim arrangements and predecessor contracts. The interconnector provides fast and reliable dynamic and static response to both low and high frequency events. In addition to the interim arrangements contract for POR, SOR, TOR1 and TOR2, Moyle is also engaged on a measurement qualification trial for FFR.

In general we acknowledge the TSOs' proposals to adjust the performance scalar methodology present a welcome improvement on the current arrangements. Responses to specific questions follow.

Question 1: Do you agree with the TSOs' proposal to award a Pass when a unit's achieved response is greater than the initial expected response (ignoring tolerances) in cases where the overall expected values is less than 0 MW?

Yes. We agree because in such circumstances a unit has clearly delivered in line with its obligation, even though the tolerance would have reduced the required response to zero.

Question 2: Do you agree with the TSOs proposal to utilise a time weighted average approach for the calculation of SOR and TOR1?

Yes. Acknowledging the TSOs' remarks about ideal governor lag, we agree that the proposed time weighted average approach provides a fairer assessment.

Question 3: Do you agree with the TSOs' proposal to retain the existing calculation of Governor Droop demand expected response?

We are content that, although the approach is imperfect, given the time and effort required to change the tools the existing calculations remain appropriate.

Question 4: Do you agree with the TSOs proposal to continue assessing ramping services based on the Fail Sync process for the duration of the interim arrangements, for all providing units which are not DSUs?

No comment.

Question 5: Do you agree with the TSOs' proposal to introduce partial fails for performance between 70% to 90% of that expected for reserve events?

Yes. We agree with this proposal because a unit delivering a little short of the current 90% threshold for a pass is still providing useful support to the system. Further, as the TSOs note, when the performance information is not data rich, falling just short of the 90% threshold can today have a long term effect on the performance scalar that is disproportionate to the undelivered quantity.

Question 6: Do you agree with the TSOs' proposed new Performance Scalar methodology?

Yes. The proposed new performance scalar methodology is much improved over the arrangements today. We particularly support the calculation of 'S' rewarding delivery between 70% and 90% of the required response, though at a lower rate than greater than 90% delivery, and introduction of the dynamic time scaling element 'V'. Together these avoid a situation (in an environment where events are infrequent) when substantial but less than 90% delivery negatively affects a generally reliable unit's performance scalar for many months.

Question 7: Do you agree with the TSOs' proposed new Data Poor resolution methodology?

Yes. The proposed approach offers a significant improvement on the current arrangements in a data poor scenario. In particular we welcome the implications that no minimum number (5) of events is required, so that one event (with successful delivery) in eight months can sustain the performance scalar and that no industry average calculation is required.

Question 8: Do you have any feedback on the type of tests to be undertaken through the performance testing process?

We broadly agree with the TSOs that frequency injection tests against the schedule 9 reserve curve parameters are appropriate for reserve services. Naturally, the process should be transparent and as far as possible consistent across units.

Question 9: Do you agree with the proposal to retain the existing business process and timelines?

No comment.