

DS3 System Services - Interim Performance Revised Methodologies Proposals

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 before close of business on 10 May 2017.

Respondent Name	Brian Larkin
Contact Telephone Number	01 233 5412
Respondent Company	Bord Gáis Energy
Is this confidential	No

Note: It is the TSOs' intention to publish all responses unless you have specifically stated the response is confidential. Please note that, in any event, all responses will be shared with the Regulatory Authorities.

#	Question	Response	Additional Comments
1	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 with comment	In the interests of increasing the opportunities to record performance events, we believe that the TSOs' proposal to award a Pass when a unit's achieved response is greater than the initial expected response is a step in the right direction.
2	Question 2: Do you agree with the TSOs' proposal to utilise a time weighted average approach for the calculation of SOR and TOR1?	Yes with comment	We believe this approach will smooth out under/ over performance in the SOR/TOR1 timeframe if the system frequency is oscillating.
3	Question 3: Do you agree with the TSOs' proposal to retain the existing calculation of Governor Droop demand expected response?	No with comment	<p>We believe that the existing TSO approach could be improved. A unit's governor will continuously react with frequency and considering a unit's performance is benchmarked on a per second basis for POR, the TSO should consider averaging the pre-event system frequency over a shorter timeframe than the current 30 to 60 seconds prior to the event. With the current methodology, we believe it brings a risk of an inaccurate expectation of the unit's performance.</p> <p>In addition to the above, it is not clear in this Consultation why the TSOs focus on the point that most events occur with a pre-event frequency less than 50 Hz. In an under frequency event, t=0s is set when the system frequency first drops below 49.8 Hz which increases the chances of the average for the previous 30s-60s being under 50Hz. Incidentally the TSO aims to maintain a low time error with prudent frequency control close to 50 Hz and so cannot continuously operate below 50 Hz.</p> <p>For assessing a unit's performance, we believe the TSO should have:</p> <ol style="list-style-type: none"> 1. An accurate pre-event frequency value; and 2. The actual governor droop of the machine.
4	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 with comment	As we have argued before, where the DS3 ramping products are readily available to the TSO when unit is synchronised, the performance of units to synchronise from shutdown does not bear any relevance to the ability to move up and down the operating range following TSO dispatch instructions. Instead of using this inaccurate proxy, we believe it would be more appropriate for the TSOs not to apply any performance metric until the systems are put in place that can measure and record the relevant data for providing these ramping products. For clarity, only where a unit needs to synchronise to provide the DS3 product, using Synchronisation Dispatch instructions as a proxy to assess ramping performance is appropriate.
5	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 with comment	We believe this approach is an improvement to assessing a unit's performance as if the unit is declared for a large volume, then the provision of 50% is still a benefit to the system and the range could be extended from 50% to 90%. However, it is unclear how the TSOs have determined 70% as a threshold value and we therefore request feedback on this calculation.
6	Question 6: Do you agree with the TSOs' proposed new Performance Scalar methodology?	Yes with comment	We believe that this proposed dynamic scalar mitigates the issue of being stuck on a poor performance scalar for an extended period of time.
7	Question 7: Do you agree with the TSOs' proposed new Data Poor resolution methodology?		<p>While the proposals welcome the opportunity for a unit to potentially reset their performance scalar to 1 if it began to degrade after a period of time, we believe that the TSOs need to cognisant of the costs to Generators for testing arrangements such as:</p> <ol style="list-style-type: none"> (a) Aligning additional resources at site to facilitate the tests; (b) Not operating under normal commercial conditions in the market (implications in ISEM); and (c) Likely testing tariffs. <p>We therefore welcome further clarity on the testing environment that a unit must be in to undertake these tests.</p>
8	Question 8: Do you have any feedback on the type of tests to be undertaken through the performance testing process?	n/a	It is good to see that Eirgrid would tailor the testing depending on the requirements (testing post plant upgrade versus simply performing a test to reset the scalar to 1). If there hasn't been any material changes to the unit, a performance scalar test should be conducted without the generator incurring testing tariffs as the risk will be low.
9	Question 9: Do you agree with the proposal to retain the existing business process and timelines?	Yes	n/a
10	Question 10: Any additional comments?	n/a	No