

**Question 1: Do you have any comments on the two options for service bundling proposed and the TSO's preferred option?**

**A: We prefer option 2 to provide 5 DS3 System Services (FFR, POR, SOR, TOR1 and TOR2) and all to the same contracted volume level.**

**Question 2: Do you have any view on the technical requirements proposed, including the requirement for over-frequency response?**

**A: 1. Our providing unit has the technical ability to provide over-frequency response, but we want to know detailed requirements of over-frequency response, such as minimum speed of response; trajectory; required reserve trigger capability and maximum service time.**

**2. We know TOR1 and TOR2 will be dispatchable via instruction from the TSO, with MW level notified to the providing unit. But we also want to know how many times this instruction from the TSO will be dispatched, and after this service, if there is another TOR1 or TOR2 required immediately.**

**It is a concern that we will not be able to provide this service again. Will this unavailability be considered as a failure of availability or will there be a minimum time regulation for charging our battery on this kind of event?**

**Question 3: Do you have any comments on the availability obligation proposed?**

**A: We understand the availability obligation will be 97%, however will it be calculated in each service or all 5 services? Is there any regulation on the maximum data for planned period of maintenance outage? We suggest it should be a yearly basis.**

**Question 4: Do you have any comments on pre-requisites with respect to Connection Offers?**

**A: We understand we need to connect to the grid before 31<sup>st</sup> of May 2018 to participate in DS3 services. As I understand the grid connection offer process time will take more than 9 months, we want to know when we need to provide this grid connection offer. If we can provide the best technology with the best service rate, but we lose the opportunity due to not receiving the grid connection approval in time, what other options are available to aspiring providing units?**

**Question 5: Do you have a view on the two options provided with respect to managing network limitations?**

**A: We prefer option 1: Connecting providers would need to provide confirmation from the TSO/DSO that network limitations will not prohibit service availability. Providers will be remunerated if unavailable due to network limitations.**

**Question 6: Do you have a view on the staged approach proposed for procurement under the volume capped arrangements?**

**A: We agree with this. But we want to know whether Eirgrid prefer to choose small volume or big volume if all the providing unit is less than 30MW, and is there any Eirgrid preferred location?**

**Question 7: Do you have a view on the proposed bid pricing requirements and the mechanism for assessing bids, determining price and remunerating providers?**

**A: 1. We agree with that contracts should start no later than 31st May 2021 and will end no later than 31st May 2027.**

**2. Performance bonds, we agree to submit a performance bond on the date of execution of the contract, chargeable in the event of non-delivery. The size of the performance bond will be based on the contracted service MW volume of the applicant. But we think that a €12,000 Per MW Bond is too high. Meanwhile, we also need bond from Eirgrid to insure that Eirgrid wouldn't cancel the contract with any reason.**

**3. We agree that prices should be submitted for each System Service within the bundle to enable the relevant scalars to be applied and to ensure the proposed tariff limits are respected.**

**4. We agree that bids will be assessed as outlined above with ongoing remuneration based on a typical wind year at contract award stage. And we prefer that bids will be assessed based on an overall bundled price, based on the calculated remuneration for each System Service for a typical year. Ongoing remuneration will be based on real system conditions.**

**5. We agree that the recommended service tariffs set the tariff cap for bids. Prices submitted should therefore not exceed these rates on a per System Service basis.**

**6. We agree that pay-as-bid pricing will be used for the volume capped procurement exercise.**

**7. We understand that whole bids will only be accepted in price order up to and not exceeding the total volume. But if Eirgrid already choose 3 applicants, each 30MW, and our providing unit is 11MW with the best technology and cheapest price of all the applicants, does this mean Eirgrid will just chose another applicant with 10MW?**

**8. We agree that a maximum contract volume of 30 MW is proposed per separate grid connection. But we want to know Eirgrid prefer to choose small volume or big volume if all the providing units are less than 30MW, and is there any Eirgrid preferred location?**

**Question 8: Do you agree with the proposed maximum contract volume proposed per separate grid connection?**

**A: We agree with this. But we want to know Eirgrid prefer to choose small volume or big volume if all the provide unit is less than 30MW, and is there any Eirgrid preferred location?**

**Question 9: Do you have a view on the proposed application of performance, scarcity, product and locational scalars?**

**A: 1. Scarcity scalar, we prefer to option1: Apply Scarcity Scalar based on ‘typical’ wind year to remuneration.**

**2. Performance scalar, we agree that the Performance Scalar outlined in Table 4 will be applied in order to incentivise availability. But the availability obligation will be calculated in each service or whole 5 services and is there any regulation on the maximum data for planned period of maintenance outage? And we suggest it to be on a yearly basis.**

**3. Product scalar, we prefer to option1: Product Scalar for faster response is applied in the calculation of bundle price for the basis of assessment. And we understand and agree with that the product scalar for Enhanced Delivery and Continuous Provision of Reserve from FFR to TOR1 will not be applied.**

**4. Locational scalar, we understand and agree with that locational incentive/scalar should not be applied for delivery of services under this initial stage of volume capped procurement arrangements (though may be used in the future if such a locational signal is necessary), but is there any Eirgrid preferred location?**

**5. We agree with the proposal that No minimum volume per jurisdiction will be set.**

**Question 10: Do you have a view on the market interactions outlined here and the proposed mechanism for mitigating?**

**A: 1. Network Charging, will the battery be considered as demand side unit or generation? We suggest battery storage plant just pay for Maximum Import Capacity (MIC), because when we provide service to the grid, if we still need to pay for Maximum Export Capacity (MEC), it will be another barrier to reduce our service rate for Eirgrid.**

**2. The trickle charge capability, if after a TOR2 event, the grid frequency returns to within  $\pm 0.05\text{Hz}$  of 50Hz for less than 5 mins every time. For example, within the following 2 hours, the grid frequency returns to within  $\pm 0.05\text{Hz}$  of 50Hz for 3-4 mins, but the frequency is beyond 49.8Hz, does this mean we can't recharge our battery within these 2 hours? If there is another TOR2 event coming after this 2 hours, do you need us to ensure we still have the capacity to do this TOR2 service?**

**Question 11: Do you agree with the proposed mechanism for assessing applications?**

**A: We agree with this.**