

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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Contact telephone number	<i>01 8578711</i>
Respondent Company	<i>Tynagh Energy Limited</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

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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>We agree that they should be bundled for Security of supply reasons. There is very limited value providing POR/SOR and then dropping off. Both options seem reasonable.</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>Option 1. Over frequency response is required, especially if these units will be facilitating the displacement of thermal units which can provide over frequency response.</p>
<p><u>Question 3:</u> Do you have any comments on the availability obligation proposed?</p>	<p>Agree that an availability obligation is appropriate. 3% forced outage rate seems high for the type of technologies involved – batteries would typically have higher availability metrics.</p>

<p><u>Question 4:</u> Do you have any comments on pre-requisites with respect to Connection Offers?</p>	<p>Preferably option #1 to mitigate non- delivery risk, but option #2 would be acceptable.</p>
<p><u>Question 5:</u> Do you have a view on the two options provided with respect to managing network limitations?</p>	<p>Option #1 gives certainty and is therefore “bankable”. The TSO should carry the risk as they are best placed to assess location suitability.</p>
<p><u>Question 6:</u> Do you have a view on the staged approach proposed under the volume capped arrangements?</p>	<p>Staged procurement makes sense. 30MW or lower so that risk (non-delivery, availability and technology type) can be spread across a minimum of 4 providers.</p>

<p><u>Question 7:</u> Do you have a view on the proposed bid pricing requirements and the mechanism for assessing bids and determining price?</p>	<p>The TSO proposal of whole bids only and not exceeding total volume is reasonable.</p> <p>Tynagh would support Remuneration Option 1.</p>
<p><u>Question 8:</u> Do you agree with the proposed maximum volume proposed per separate grid connection?</p>	<p>The TSO proposal of 30MW seems reasonable, but 100MW is definitely too high considering phased procurement.</p>
<p><u>Question 9:</u> Do you have a view on the proposed application of performance, scarcity, product and locational scalars?</p>	<p>Performance scalar should not only be based on availability, underperformance should also be factored in.</p> <p>We would disagree that a product scalar should not be applied, and that there should be a scalar for continuous provision.</p> <p>We would support Option 2 for the FFR product scalar.</p> <p>We support the TSO proposal that Locational Scalars should not be applied.</p>

