



Agenda -

Topic	Time	Speaker
Introduction and Welcome	13:00	Ian Connaughton 10 min
Setting the Scene – A Vision for DSM	13:10	Jonathan O'Sullivan – 10 min
Performance Monitoring UpdateTSOGroup Discussion	13:20	Mark Gormley – 20 min All – 10 Min
DSM - Industry DiscussionIndustry PresentationGroup Discussion	13:50	Paddy Finn (Electricity Exchange) – 25 min All – 35 minutes

Close – Next Steps











Agenda

- Context
- Performance Monitoring stats
- Performance Monitoring discussion points
- Direction / next steps

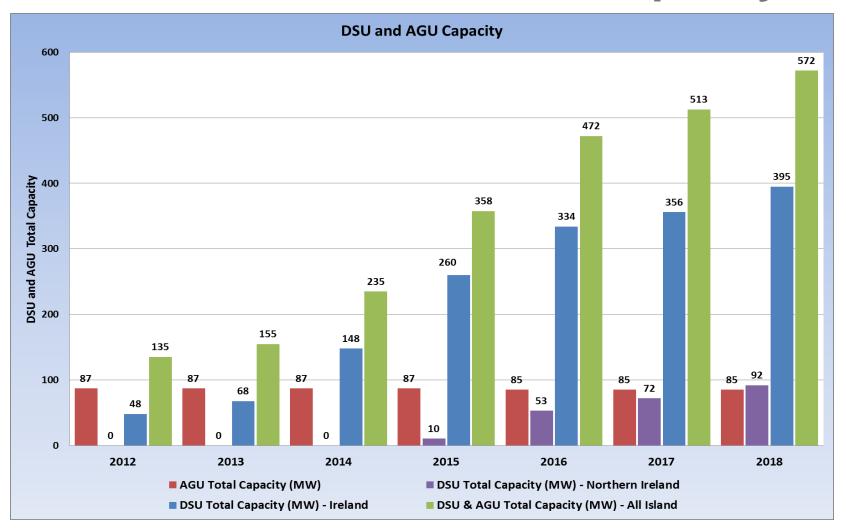


Context

- Large growth in aggregation between 2012 2018
- Historic model focused primarily on CPM revenue
- Aggregators now participating in
 - I-SEM Capacity Market
 - I-SEM Energy Markets
 - DS3 System Services
- Good performance essential for Safe Secure System Operation
- Good performance also essential for Aggregator revenue certainty
- Increased focus on performance monitoring going forward



Growth in AGU and DSU capacity





Shift change in revenue 'pots'

2016

7 Services

- Reserve
 - Primary (5-15 sec)
 - Secondary (15-90 sec)
 - Tertiary 1 (90-300 sec)
- Ramping
 - Tertiary 2 (5-15 min)
 - Replacement spinning (0.25 4 hour)
 - Replacement de-synch (0.25 4 hour)
- Voltage
 - Steady State Reactive Power

Ancillary Services €60,000,000

Capacity Payments €500,000,000

AGU and DSU Contracted Volumes System Services Phase 1 (2018) POR SOR TOR1 TOR2 RRD RM1 RM3 RM8 Ireland 56 55 70 51 168 326 28 28 Northern Ireland 4 11 72 82 108 77 76 58 81 123 250 | 434 | 105 Total

Energy Payments €2,000,000,000

2020

System Services Up to €235,000,000

Capacity Payments €330,000,000

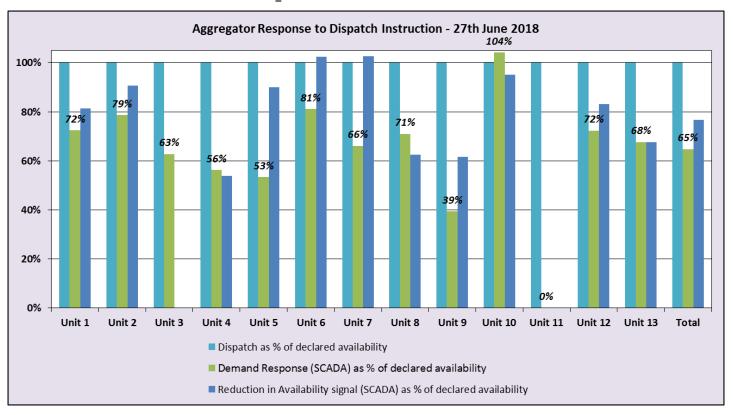
Energy Payments < €2,000,000,000

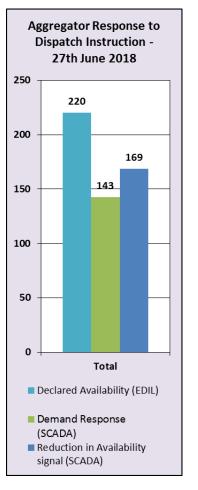
14 Services

- Inertia / Emulated inertia response
 - Synchronous Inertia
 - Fast Post Fault active Power recovery
 - Fast Frequency Response (<2 sec)
- Reserve
 - Primary (5-15 sec)
 - Secondary (15-90 sec)
 - Tertiary 1 (90-300 sec)
- Ramping
 - Tertiary 2 (5-15 min)
 - Replacement spinning (0.25 1 hour)
 - Replacement de-synch (0.25 -1 hour)
 - Ramping Margin 1 (1-3 hour)
 - Ramping Margin 3 (3-8 hour)
 - Ramping Margin 8 (8-16hour)
- Voltage
 - Steady State Reactive Power
 - **Dynamic Reactive Response**



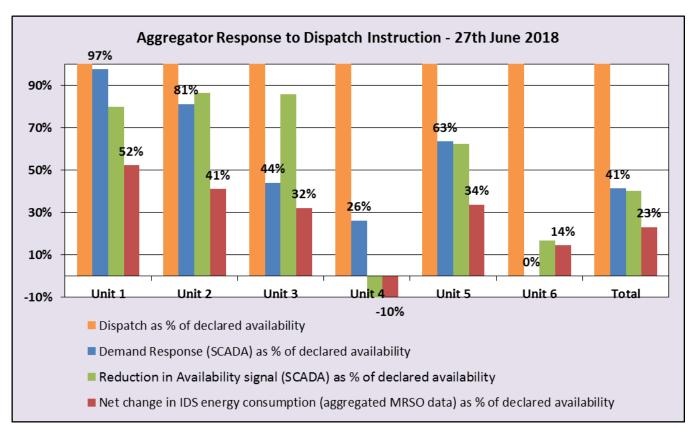
Unit Dispatch Ireland – 27th June 2018

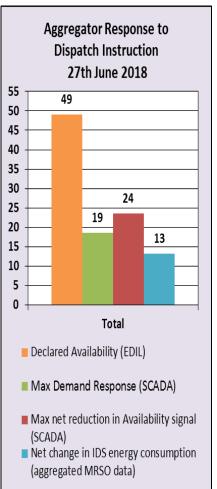






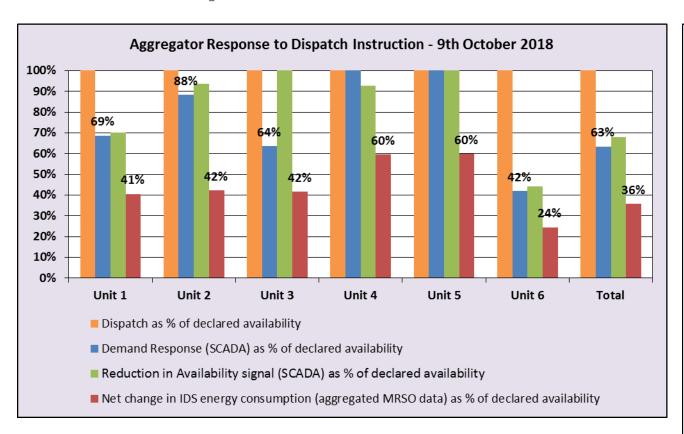
Unit dispatch N. Ireland – 27th June 2018

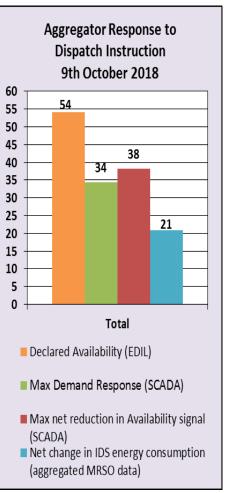






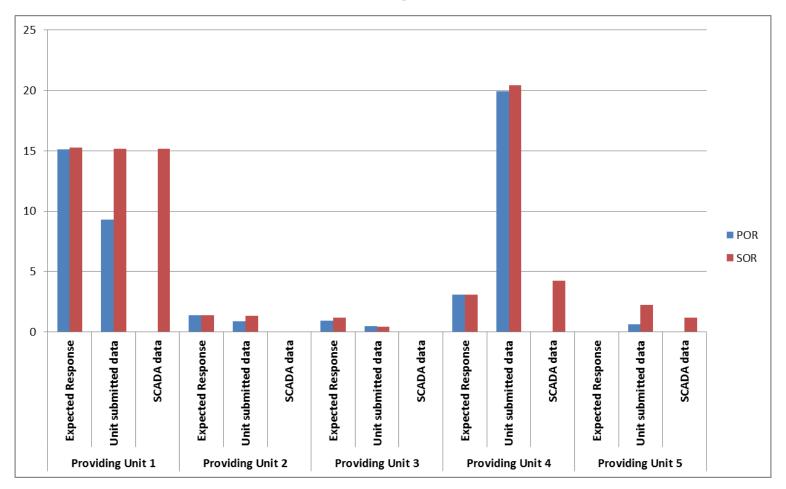
Unit Dispatch N. Ireland – 9th October 2018







Frequency Event Performance – 12th July Frequency Event

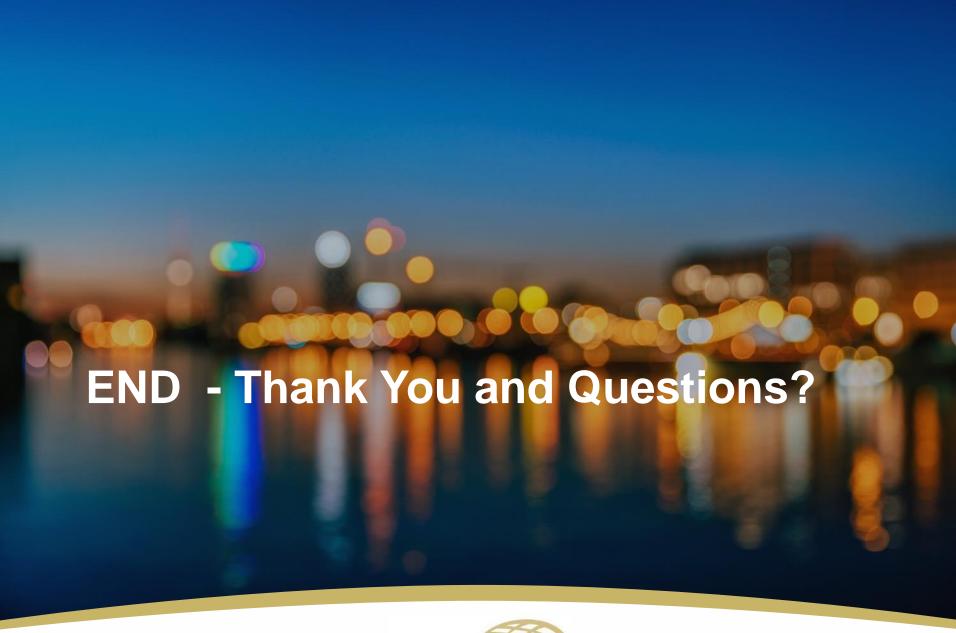




Performance Monitoring

- System operation relies on actual performance matching expected performance
- Ensure units adhere to applicable codes and contracts
 - Grid Code requirements
 - DS3 System Service contracts
 - Capacity Market
- Areas of focus
 - Frequency event response
 - Response to dispatch instruction
 - Accuracy of SCADA
 - Accuracy of declarations
 - Accuracy of forecasting







Industry Perspective Slides

Paddy Finn





Summary



1. Introduction:

- Benefit of DSUs
- DSU Performance
- Trend of DSU Marginalisation

2. Issues:

- Joint Market Registration
- Single VTOD, Single EDIL Instruction
- Static Reserve Characteristic
- RO Exposure when not Dispatched
- DSO/DNO Instruction Sets

3. Going Forward

Benefits of DSUs



- DSUs provide a cost effective system balancing solution:
 - Utilise existing assets
 - Sunk costs and sunk carbon

Returning value back to the customer, reducing the need for investment in alternatives

- Batteries, peaking plants, etc
- Demand flexibility enabling more responsive grid
 - Facilitating generation from variable renewable energy sources
- Inherent DS3 system services capability
- Technology exists and is market ready
 - Don't need to wait for smart meters;



DSU Performance



- Result from NI dispatch test on 27th June is not representative of the collective performance of DRAI members
 - 38% delivery of declared availability driven by non-performance of a few and not poor performance by all
- DRAI members are committed to delivery of services through prudent operating practice as per Grid Code requirements;
 - Support initiatives from RAs to restrict and penalise activity that has disregard for the code
 - Members invest considerably in ICT to enable automated high speed response to system frequency events and TSO instructions;

Trend of DSU Marginalisation



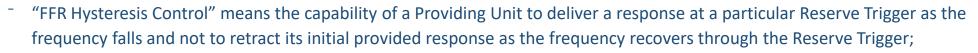
• The industry has observed a trend of decisions against which we have to battle for fair and equitable terms

T1 and T4 capacity auctions are applying increasingly punitive industry-wide de-rating factors on DSUs rather than

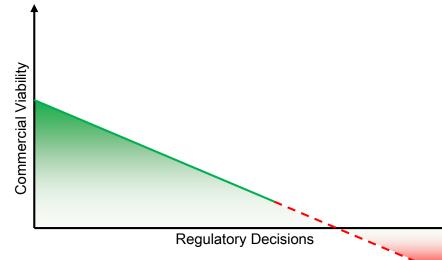
unit-specific de-rating factors or elected DECTOLs.

Long-run DSUs appear to inline for inequitable treatment in the market.

- Initial exclusion from volume uncapped market,
- Current proposals for volume capped market directly conflict with the characteristics of demand response,
- DSUs are not allowed to benefit from DS3 hysteresis scalar despite their ability to deliver on the strict definition of the requirement:



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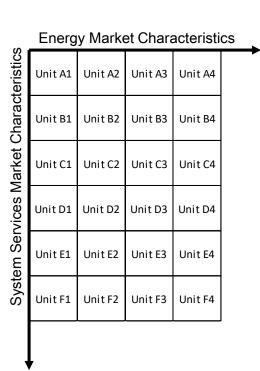
Joint market registration



 The capacity market and system services markets are technically and commercially very different

- Registration process currently includes the following conflicting parameters:
 - Energy & Capacity Market
 - IDSs need to be grouped by VTOD, de-rating factors, and location
 - DS3 Market
 - IDSs need to be grouped by similar speed of service response and service groupings

Optimised permutations would require unwieldy number of units



Joint market registration



- Required Change:
 - Separation of Energy/Capacity and DS3 System Services registration
 - IDSs can participate in different units for Energy/Capacity market and DS3 System Services market



- Interim Solution:
 - Allow group commitment to Reliability Option
 - Underlying units have a shared responsibility to deliver on combined capacity obligation
 - IDSs can then be moved between units to optimise DS3 System Services characteristics



Single VTOD, Single EDIL Instruction

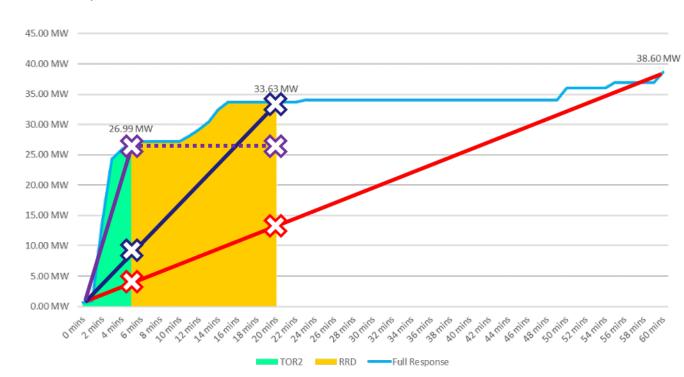


Issue:

- Single-step VTOD cannot capture individual ramp-rates for TOR2, RRD, and max declared availability
 - Setting VTOD based on unit capacity assumes that TOR2 = 8.3% of unit capacity and RRD = 33.3% of unit capacity
 - Setting VTOD based on TOR2 or RRD ramp rates assumes MDMW can be achieved faster than is possible
- Multi-step VTOD cannot capture variable nature of DSU ramp rates based on mix of available IDSs
 - Varying availability changes points of inflection in multi-step curve

• Solution:

- TOR2, RRD, MDMW specific EDIL instructions
 - Assume 5 minute ramp for declared TOR2
 - Assume 20 minute ramp for declared RRD
 - Assume VTOD ramp for MDMW



Static Reserve Characteristic



Issue:

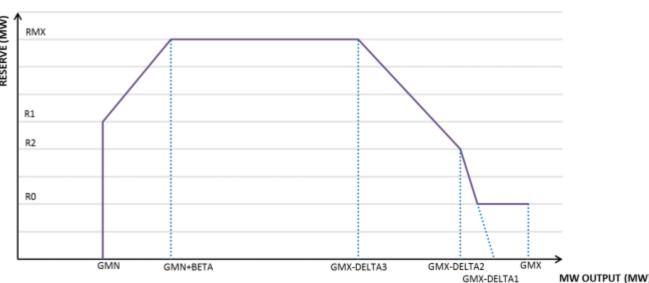
- Static Reserve Characteristic in Schedule 9 of the DS3 System Services Contract is designed to characterise conventional generators and is only accurate for DSUs when all IDSs are available for their full tested capacity
- This fails to account for the inherently dynamic nature of a DSU's availability

Action:

• TSO must acknowledge that the static Reserve Characteristic is not appropriate for DSUs and agree not to require adherence to these values for the purposes of

performance monitoring.

 Alternative method of declaration of availability and ramp rates for each DS3 System Service should be investigated



RO Exposure when not Dispatched



Issue:

- DSUs, along with other units types, have been exposed to difference payments during scarcity events when not dispatched despite being in merit
- Affected units are available and delivering on the spirit of their obligations to the CRM but are not afforded any
 opportunity to mitigate this risk
- Market power is being handed to units operating in constrained areas

Solution:

1. Units scheduled for non-energy actions should be prevented from setting subsequent energy prices

2. During a scarcity event, a unit should only be exposed to difference payments when they have a declared availability of 0 MW or, where their declared availability > 0 MW, for their:

(load following adjusted RO volume minus their declared availability)

(their under-delivery on their declared availability)

DSO/DNO Instruction Sets



Issue:

- Letter dated 5th October 2018: The CRU and UREGNI overturned a previous decision that set out that instruction sets resulting from DSO/DNO congestion should not have a negative financial impact on DSUs
 - This decision was subsequent to the T-1 capacity auction and wholly undermined the assumptions that underpinned DSUs' RO commitments
- IDSs subject to instruction sets cannot contribute to a DSU's ability to deliver on its RO
- Instruction sets have historically been issued with 1 working days notice making it technically impossible to replace lost capacity, even if it were commercially possible
- IDSs can become subject to an instruction set at any time, removing any certainty of cost-recovery post-installation and removing any certainty of customer income
 - It is no longer possible to provide current or prospective clients with any reasonable level of commercial certainty
 - This promotes the systematic objection to planning permission for renewable energy installations local to IDSs
- All risk has been transferred to DSUs while the DNO and DSO are the only parties who can manage the risk
 - The DNO and DSO have done little to reduce this risk and are not incentivised to do so

Action:

 Suggest action: DRAI seek TSO support to emphasise the need to remove instruction sets / incentivise DNO/DSO to prioritise issue



Summary of Issues



1. Joint Market Registration

• Separate unit IDS registration for Energy/Capacity Market and DS3 System Services Market

2. Single VTOD, Single EDIL Instruction

Individual EDIL instructions should be issued depending on response required

3. Static Reserve Characteristic

TSO asked to acknowledge unsuitability of static reserve characteristic for DSUs

4. RO Exposure when not Dispatched

 Units should not be fully exposed to difference payments when available and in merit but not dispatched

5. DSO/DNO Instruction Sets

• TSO must impress unviability of current situation on RAs and seek an alternative agreement



Going forward



- DSUs are an important system balancing tool -- TSO can utilise demand response in support of renewable energy targets
- Under SI No. 426 of 2014 CRU is required to promote demand response and work in close cooperation with demand service providers
- DRAI are committed to developing the market for DSU, however, DSU marginalisation is undermining the viability of the industry

Market development



- Demand response in Ireland has potential to grow significantly -- DSU sector experienced considerable growth in the current capacity year (based on more favourable market conditions);
- DRAI want to work with RAs to develop the market and support achievement of national renewables targets;

DRAI request

- RAs establish a dedicated DSU industry forum to facilitate discussion of technical issues;
- RAs assign responsibility for DSU market development dedicated DSU resource;