



Energy for
generations

ESB Generation and Trading's response to TSO PR5 Imperfections & Constraints Multi-Year Plan 2022-2026

03/12/2021



ESB Generation and Trading (ESB GT) welcomes the opportunity to respond to this consultation. The comments are grouped into three categories:

- Weighting
 - In terms of performance assessment, the weighting of each criteria should reflect the importance of the criteria in achieving the overall objective i.e. reducing imperfections and constraints. While transparency is always welcome it is unclear how the Enhance access to imperfection cost reports task will reduce imperfections and constraints in the same manner as the reserve policy review following commissioning of new technologies cast. Further reasoning is needed as to the proposed weighting.
- Reserve policy review following commissioning of new technologies
 - A review following the implementation of new technologies is an important step in integrating these technologies. However, the review should incorporate more than just grid code compliance. There is a need to review the TSO's systems and how they accommodated new technologies and whether these were blockers to new technologies and resulting in imperfections. For example, the assimilation of the sync comp and BESS into the market also needs to be considered not just the connection testing. Currently BESS are not allowed to submit negative PNs which will impact on imperfection charges if there is a big difference between QEx and FPN and DQ and MG.
 - Additionally, transparency of EirGrid's OPRC assessments and justifications for the outcome / changes (or lack of) to policy is needed.
- Overall
 - In the PR5 decision paper a TSO report template was defined as containing;
 - number of constraints on the system, how long each constraint has been in place, and how long each is forecast to be in place,
 - the number of constraints that have been removed in the last year,
 - the volume of system services dispatched by the TSO through non-energy actions during periods when there were available volumes of system services at FPN that were not dispatched,
 - the total cost of imperfections relative to the expected cost that year, and



- the total savings directly attributable to TSO actions.
- Is it the intention of the TSO to produce the reports as per the CRU decision for the two constraints identified in this consultation?