Performance monitoring & Pre-qualification

Before manufacturers will produce product for pre-qualification we need incentives and long term returns on investmmnets

Condiser using the operational API and performance APIs that are being used for some of the newer response services

The prequalification needs to fully comply with the minimum technical requirements in SOGL Articles 154/155, 158/159 and 161/162

Only open to thermal generation subject to submission of EA Permit information evidencing compliance with the MCPD-specified Generator Controls, including EA Customer Number, Permit ID, data of test, NOx and CO levels at date of test and permit end date

Consider performance monitoring requirements for the new suite of products as a whole. Sending multiple perfmon files, at diferent resolutions becomes challenging, only having to send one would be better

Technology neutrality is not an end in itself. Need appropriate, comparable treatment of all applicable resources, even if that means different details to accommodate different technologies.

Utilising HH meter data simplifies access, as per ODFM. More detailed metering is cost prohibitive on smaller assets

Approach to baselining is key to market accessibility. Requiring PNs to be submitted an hour ahead of real-time excludes a lot of DSR and, potentially renewables. ESO should consider use of historic baselines (preferred) or, if nominated baselines must be used, either using filtered meter signal or letting them be submitted close to real-time. Historic baselines are most common approach in international markets and the optimal approach, though.

Think carefully about accuracy requirements. It is common to have asymmetric tolerances -- i.e. severe penalties for not delivering enough, but not for delivering a bit too much. (There's already economic incentives not to over-deliver, in addition to imbalance costs.) It's the width of the total band that matters, in terms of the range of assets and customers that can participate.

No, the PN is not a useful baseline for many resources.

Definitely support the scalability and automation.

Type testing approval will be important for unlocking access to smaller scale (eg aggregated residential scale assets)

Transparency for all or none - can't have some parties posiitons are known to all and others not.

Support ESO testing of MCPD plant compliance to facilitate carbon monitoring of services

Standardised rules, baselining, and incorporating past asset performance would be best - if this discriminates against some asset types/providers then that's a good thing for efficiency, surely?

Speed of sampling is 10% of ramp time plus 500 measurements over the delivery period

Performance monitoring & penalties preferred rather than pre-qual. Quicker access, and also allows ESO to 'trust' industry to hit standards early - rather than dictating tests that might be hard to do / not relevent

If you have availability decs in ASDP why not basline as you do in STOR

how will you ensure metering is appropriate / not disproportionate for smaller assets? This remains a major technical barrier to unlocking aggregated batteries

Baselining is proving to be a blocker for certain assets to participate in the new response services (DC etc). Some assets are partly available and hence their non controllable elements are not known in advance making an accurate baseline difficult to produce accurately. Enabling a mechanism where this "uncontrolled" element can be removed is important to enable demand or BTM type assets participate. Options would be: allow the baseline to be derived by eliminating the uncontrolled element of the asset or to performance monitor against real-time availability at event time (as opposed to a preset baseline).