

Comments and Observations

Date: 19/08/2016	Respondent: Irish Wind Energy Association	Project: Contestability of Commissioning Consultation (CER-CC-00-001-RO)
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No.	Document	Section number (e.g. Clause 3.1)	Type of comment ²	Comments	Proposed change	Observations of EirGrid / ESBN
1.	General Comment			<p>IWEA welcomes the opportunity to comment on the SOs Consultation on Contestable Commissioning, and we believe that the provision of contestable commissioning is important to support the build out of renewables in particular given the significant number of connections expected in the coming years. IWEA supports contestable commissioning however we have a number of concerns with the current proposals will not achieve the potential benefits.</p> <p>It is essential that there is sufficient information available to be able to establish whether there will be benefits associated with contestable commissioning. IWEA has previously requested a breakdown in standard charges, including information relating to the costs of commissioning. This will be essential information to determine the most appropriate approach for a given project.</p>		
2.	General Comment			<p>The timelines presented in the consultation limit any flexibility of the participant – 18 months notification does not allow for flexibility and changes to the project design.</p> <p>Multiple timelines are referenced throughout documentation, consistency and a realistic requirement needs to be developed.</p> <ul style="list-style-type: none"> • Section 3 of consultation paper: 12 weeks notice in advance of interface commissioning, • Section 5.3 of consultation paper: 18 months prior to commissioning latest for offer mod request – is this date known at this time? It should be linked to energisation date. It should be noted that there can't be 		

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				<p>a time deadline without access to reasonable certainty of programme and that depends on ESBN engagement pre-SSP so hard to see how this will work. It may be worth a workshop with industry and contract commissioners on this to talk through workable logistics and timings</p> <ul style="list-style-type: none"> Section 4.1.1 of Schedule 10 has 60 business days to elect not to carry out commissioning 		
3.	Joint Consultation Paper	2. Applicable Transmission and Distribution Assets		Contestability for commissioning should be extended to incorporate more of the exceptions in Section 2 and that there should be no reason why you cannot commission projects that you have not built. Also partial contestable commissioning should be offered i.e. line commissioned, station not etc. (Section 2 of consultation paper)		
4.	Joint Consultation Paper	5. Commercial Considerations		<ul style="list-style-type: none"> Level 1.5 modification fee of €5,283 appears to be high. Level 1 fee should be sufficient to merely change Connection Agreement to contestable commissioning. SOs to update standard costs to reflect cost savings offered by commissioning contestability. IWEA has requested more detailed information in relation to the breakdown of costs, including the costs of commissioning. This information needs to be made available so that the savings offered by commissioning contestably can be established. 		

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5.	Joint Consultation Paper	5.2		<p>It is our view that the resource requirements of EirGrid are too intensive.</p> <ul style="list-style-type: none"> One day for every four man days of the contestable commissioner is unnecessary 10 man days to assess the proposed commissioner is also completely unnecessary and should not be undertaken on project by project basis. A database of accredited commissioners would be more appropriate. 		
6.	Joint Consultation Paper	5.3		A 40 day review of the commissioning plan with no responsibility is an inappropriate use of time.		
7.	Joint Consultation Paper	5.4 Mod Offer Timelines for 2017		Welcome the one off flexibility proposed for 2017, however believe that this flexibility should be afforded to all REFIT project connections which will have significant impact on resources. This flexibility should therefore be written to coincide with the latest possible commissioning for REFIT rather than the calendar year 2017		
8.	Joint Consultation Paper	8 – Liabilities and Contract Charges		<p>The indemnity and 7 year warranty is overly prohibitive</p> <ul style="list-style-type: none"> Uncapped liability on downstream effects is too penal and there may not be products available to participants to cover this, Removal of commissioner resulting in restart from start of process, should be assessed on case by case basis to determine if full repeat required. <ul style="list-style-type: none"> Schedule 10: 4.6.2: repeat of tests has to be in extreme circumstances only, not unnecessarily required 		

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				<ul style="list-style-type: none"> ○ Schedule 10: 4.9.1 & 4.9.2: rejection has to be reasonable and for critical issues (identified in advance?) ● Risk of de-energisation unmanageable risk (Section 8 of consultation paper) ● Schedule 10: 2.5.6 & 2.5.7: SOs are responsible for excessive requirement or mistake in specifications ● Schedule 10: 6.1: this is not feasible: TAO may carry out maintenance etc. works in this period, customer is then no longer liable 		
9.	Joint Consultation Paper	9. Review		Connections forum similar to Grid Code Review panel required for regular review and modification approval of connection documentation		
10.	Contestable Commissioning Specification	11. Mandatory References		<ul style="list-style-type: none"> ● The EirGrid & ESB commissioning procedures have not been published, it would be helpful if these were published as they are mentioned a number of times. ● Is the EirGrid Maintenance Policy TAM-AMP-2008-I01 available 		
12.	Contestable Commissioning Specification	13. Contestable Commissioning Acceptance Process		<p>The proposed approach should offer a lot more flexibility</p> <ul style="list-style-type: none"> ● The need to specify and only have one commissioner involved in commissioning is a risk. Participants should be able to nominate panel to minimise risks to overall commissioning that are inherent with having only one individual responsible. ● Clarity is required as to who approves commissioners, ESB or EirGrid? 		

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				<ul style="list-style-type: none"> If proficiency in any other power system test equipment acceptable, or does it have to be Omicron? If so this will be extremely limiting. Previous utility experience required – having worked with a utility or is commissioning on behalf of a utility or connecting to a utility network sufficient? More clarity required. 		
13.	Contestable Commissioning Specification	14. Commissioning, Project Completion and Handover		<ul style="list-style-type: none"> The proposal for sign off only at DOF stage are too prohibitive and unnecessary given the presence of SO/AO resources during the commissioning. Sign off should be allowed on a milestone by milestone basis. Is there a timeline for how long the fingerprinting of the substation equipment will take? The fingerprinting should also go contestable. Is there a contradiction in 14.4.2 requirements of the DOF. One bullet points asks for the DOF no later than 20 days prior to energisation of the plant. In the next paragraph it should be submitted after all switching has been completed and no later two days after verbal communication. 		
14.	Schedule 10	2.5.3.6		30 business days' notice of testing not feasible		
15.	Schedule 10	2.5.6		Entry to substation should be permitted by agreement and not completely prohibited.		

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16.	Schedule 10	4.7		Same notice period should be required by SOs and Customer: 15 business days or less for both.		
17.	Schedule 10	5.2.6		Requirements have to be identified before customer contracts with commissioner		

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