#### **Requirements for Generators: Banding Thresholds – SO View**

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#### **Topics**

- SO position on banding levels
- Justification:
  - Consistency
  - Ensuring proportionate generator response
  - Changes in generation mix
- Aspects out of scope for banding setting
- Next Steps

#### **SO position on banding position**

NGET recommends that the RfG 'type' thresholds for GB are adjusted from their maximum positions as set in the current draft of the code to:

	Туре А	Type B	Type C	Type D
<b>Connection Voltage:</b>	<110kV	<110kV	<110kV	>110kV
Module Capacity:	0.8KW-1MW	1MW-30MW	30-50MW	50MW+

This reduces the levels at which generators will be designated type C or D on the basis of capacity from the draft code position which is:

	Туре А	Туре В	Туре С	Type D
<b>Connection Voltage:</b>	<110kV	<110kV	<110kV	>110kV
Unit Capacity:	0.8KW-1MW	1MW-50MW	50-75MW	75MW+

SO believes it *could* also build a case for adopting the more onerous January 2014 draft position if future requirements dictate this (i.e. B = 1-10MW, C = 10-30MW)

#### **Justification: Consistency**

Greater consistency with existing generator designations in the Grid Code – particularly existing levels in Scottish TO.

Generator	Direct Connection to:				
Size	SHET	SPT	NGET		
Small	<10MW	<30MW	<50MW		
Medium			50-100MW		
Large	10MW+	30MW+	100MW+		

- However the NGET proposal is still higher than the existing level set in the SHET TO region:
- Grid Code (CC 6.3.7(e)) requirements on Frequency Response – setting a consistent levels of support on both synchronous and non-synchronous technologies

#### **Justification: Proportionate Response**

- SO believes generators inherently capable of providing support (e.g. Frequency Response) should be bound by a codified obligation. Relying on commercial inclination is too uncertain
- This makes the setting of the Type B/C threshold critical
- Manufacturers of equipment in a 'medium-large' scale already configure majority of hardware to support the more onerous GB and EU regional Grid Code requirements. Post-RfG this will be no different
- Hypothetically, the majority of operational schemes that would fall within the Type C MW range proposed by NGET, would largely be technically capable today

#### **Justification: Changes in generation mix**

- Predicted 22GW of Type A and 7-9GW of Type B generation (majority is non-synchronous + embedded) by 2025 represents significant concern to SO in continued secure operation of the system
- This is exacerbated by predictions of larger thermal plant being decommissioned in the next decade
- RfG's obligations on smaller generators ensure that, where reasonable, there is sufficient replacement volume to assist. This will indirectly assist with proliferation of renewables
- Active power cessation, Fault Ride Through and voltage / reactive performance requirements set for Type A and Type B respectively, will become all the more critical if banding thresholds remain at a 'high' level.
- Co-ordination between Transmission & Distribution critical

#### Aspects out of scope for GB banding setting

- Path to market for delivering ancillary services:
  - The SO acknowledges this is an important consideration to generators, and shares concersn about 'stranded' assets
  - However RfG as a connection code is focused on setting obligations based on technical capability - not encouraging commercial behaviours or setting out contractual/market arrangements
  - We want to work with industry to resolve these points (for example under GC0087 Frequency Response), but this is not covered by GC0048
- The upper threshold for Type A generator banding is not debatable being set across Europe at 1-1.5MW

#### **Next Steps**

- Thursday 12 March onwards workgroup submit any comments on the draft report (back to RJW)
- Thursday 19 March GC0048 initial presentation of workgroup report (+ these slides)
- Friday 20 March Tuesday 14 April workgroup additions to report:
  - Finalise generator cost gathering
  - Finalise generator + SO (GC0048) CBA
- Tuesday 21 April GC0048 presentation of comprehensive draft of workgroup report + indicative position on where GB banding should be (noting that any final position can only be ratified via industry consultation, NRA approval, and RfG entry into European Law)