

Minutes

Meeting name	GC0048: Joint GCRP/DCRP Workgroup on National Application of RfG
Meeting number	2
Date of meeting	24 March 2014
Time	13.00 – 16.30
Location	National Grid House, Warwick, CV34 6DA

Attendees

Name	Initials	Company
Rob Wilson	RW	National Grid (Chair)
Robyn Jenkins	RJ	National Grid (Technical Secretary)
Antony Johnson	AJ	National Grid
Andy Vaudin	AV	EDF Energy
John Norbury	JN	RWE
Mick Chowns	MC	RWE
Mike Kay	MKA	Electricity North West
Mick Barlow	MB	S&C Electric Europe
Steven Mockford	SM	UK Power Networks
Alan Creighton	AC	Northern Powergrid
Chris Marsland	CM	(on behalf of) CHPA & AMPS
Peter Thomas	PT	Nordex
Joe Duddy	JD	RES
Alastair Frew	AF	Scottish Power
Campbell McDonald	CMD	SSE
Gareth Parker	GP	DONG
Julian Wayne	JW	Ofgem
Sarah Carter	SC	PPA Energy

Apologies

Mustafa Kayikci	MKY	TNEI
Philip Jenner	PJ	RWE
Peter Bolitho	PB	Waters Wye Associates
Alan Mason	AM	Senvion
Guy Phillips	GP	EON

1 Introductions/Apologies for Absence

1. The Chair welcomed the Workgroup and apologies were noted.

2 Progress Update

2. RW provided a progress update on RfG, highlighting that there have been informal discussions on the code at the January and February Cross Border Committee Meetings.
3. RW explained that an ECCAF Code Mapping group (CMWG) was in progress. The CMWG was formed as ECCAF requested that the Code Administrators, as technical experts on GB Codes, prepare the initial mapping of ENC requirements to GB codes and also highlight to DECC and Ofgem where items in the ENCs fall outside the GB codes such that they can be considered.
4. The CMWG are assigning articles of the ENC Sections to the GB Codes. ECCAF will then consolidate the work of the CMWGs and send the information to the GB Code Panels for agreement and implementation. The first RfG CMWG was held on 12 March with the second part scheduled for 27 March.

3 Feedback from DECC to Commission

5. RW commented on the feedback DECC provided to the Commission. The headlines include
 - GB stakeholders wish to increase the flexibility of application of Fault Ride Through requirements to type B generators
 - GB Stakeholders wish to align the starting point for the GB banding thresholds with the continental block. TSOs can then adjust these levels down (ie including smaller generators in more onerous requirements) subject to public consultation and NRA approval.
 - DECC suggested words on the process through which code requirements can be applied retrospectively to existing generators to further define their use in exceptional circumstances only.
6. JW added further detail noting that there have been valid arguments both for and against fault ride through for Type B generators. Ofgem believe that an industry led investigation is the best way to assess the costs and benefits of FRT for Type B Generators. Given that there is not time to do this before Comitology flexibility of application provides time to carry out such an assessment and act on the findings. RW suggested that thought needed to be given to the timing of such a decision such that the need for evidence did not result in shutting the door after the horse had bolted and needing to consider retrospective application again, to which JW indicated that work on this will commence soon. MK noted that there was work done on this in GB in 2004 and the requirements were not extended to type B, he suggested that these proposals could be the rest of Europe catching up. AJ added that the intention was never to apply the requirement to distribution system faults at 132kV or below. The GB SO's requirement is still only for FRT of transmission system faults and is to limit total losses to within the largest infeed loss level as defined in the SQSS – which increases to 1800MW on 1 April 2014. Having said that AJ advised that Embedded Generators would need to remain connected for a Transmission System fault.

4 Timescales

7. RW noted that comitology is still expected to be completed towards the end of 2014, and that the code applies to new generators, still defined as those that have not let contracts for major plant items by 2 years after the code's entry into force (so assumed late 2016). The compliance period in the code is defined as x years in the current draft rather than the previous figure of 3 years, but this could still be the end of 2017.
8. RJ explained that the Workgroup can continue looking at the major topics under RfG ahead of comitology ready to start implementing changes in early 2015. If comitology were to finish at

the end of 2014, the Workgroup will have around 12 months to complete its Terms of Reference. RW added that this would be necessary to begin reflecting RfG requirements as defined through the GB application process into the GB Grid Code and subsequently into contracts for new equipment being let from late 2016 onwards.

5 Code Applicability

9. AJ gave a presentation on the applicability of RfG requirements.
10. AF noted that the definition of Power Park Modules (PPM) in GB is different to Europe and includes hydro and other inverter type generation whereas PPM's in GB only consider Generation powered by an intermittent power source to be a PPM. The Workgroup noted that the definitions in the current version of the code are highlighted and therefore subject to change. Work on the definitions is ongoing on a trilateral basis between ENTSO-E, ACER and the Commission.
11. JN noted that refurbished plant continues to be an uncertain area. AJ suggested that the same principals as today should be applied, since GB takes a pragmatic approach as to whether to impose original or new requirements. AJ noted that this is included in the RfG code as provisions for modification of equipment (article 10.6 (g) & (h)). MK added that it does not contradict what we do today and should be continued. AV noted that French parties are looking to add words to better define like-for-like replacement. CMD added that Power Park Module extensions are not clear.
12. MK noted that when the GC0035 Workgroup started the assumption was that RfG would be drafted to mandate retrospective application. This is not the case. MK noted that the route for retrospectivity is now through the existing frameworks and it is up to the relevant Workgroup to demonstrate the necessity.
13. AJ highlighted the areas of the Grid Code not impacted by RfG. MK noted that the ENC's are silent on maintaining any existing codes. CMD suggested that adding in the new ENC requirements would be "gold-plating" leading to extra cost. RW pointed out that the ability of member states to maintain or establish more detailed code requirements where these do not impact cross border trade is addressed in regulation 714 which established the 3rd Energy Package. The intention is not "gold plating" but that as ENC's are only concerned with issues that impact cross border trade, there is no intention to change anything which is not directly impacted by RfG. JN suggested that there should be a review of what is in the codes at present to ensure that the requirements are fair and relevant.
14. SC gave a presentation highlighting some of the options for the integration of ENC's into the GB Distribution Code and supporting documents. SC explained that the ENA have asked her to look at making the documents as simple as possible for both generators and demand Users, DNOs and NGET. Consideration of governance and future changes is also important. SC highlighted the 4 options they are considering:
 - i. Add on new requirements to existing GB documents (D Code, G83 and G59)
 - ii. Create new SCO (Specification, Connection and Operation) EU Generator type based and Demand Categories
 - iii. Create a number of SCOs using existing GB classification for G83/G59
 - iv. Add on existing requirements to EU documents by generator type.
15. SC noted that these documents are only for any new generators, since existing generators would still use the existing codes, but that any new connectees would need to easily find all of their requirements in the new document/documents. The aim of these structures is to enable application of the other ENC's, not just RfG. The Workgroup noted that generator types A and B can be mapped to the existing documents. MK added that traditionally there were not many large generators who connected to Distribution, and at present they are directed to the Grid Code requirements, MK suggested that it may be sensible for that to continue. JN noted that a

suite of documents such as this could be applicable to all sizes of Generator, with different chapters for different types. RW added that the cumulative nature of RfG requirements for type A-D generators presents some further challenges and may entail some replication of requirements across the various GB code vehicles although acknowledging as a general principle that this is usually best avoided. The Workgroup concluded that more discussion is needed for type C and D Generators and there is further complication as the Operational Codes are generally retrospective.

6 GB Banding Thresholds

16. AJ explained the RfG banding and the difference to the current GB classification for generators. During comitology there is a possibility that the RfG thresholds could increase from their levels in the current draft. National Grid would not wish for the thresholds to be increased beyond the current analogous Grid Code levels in order to protect security of supply. Should the levels be increased to align with Continental Europe, National Grid would then wish to use the process defined in the code to reduce the levels to values which are similar to those currently proposed for GB. This would require public consultation and NRA approval. JD raised a counter argument that the RfG drafting, influenced by National Grid, should not effectively lower the thresholds for applicability of requirements to GB generators without involvement of normal GB code governance processes.
17. JW clarified that the threshold values in Table 1 of the RfG will not automatically apply if GB does nothing - they are not the default Maximum Capacity threshold values. Instead TSOs are obliged to choose (through NRA approval) Maximum Capacity thresholds for each Type; the values in Table 1 of the RfG simply represent the maximum values that these Maximum Capacity thresholds can be.
18. AJ noted that the current sizing is based on registered capacity and geographic area. JN queried whether, for co-gen sites, it is the net export. MC responded that net export should be registered capacity. MK asked whether RfG prevents GB having a different banding in Scotland, RW noted that one set of thresholds applies per synchronous area.
19. The Workgroup discussed the examples National Grid provided and the implications of RfG.

7 Review of Actions and Approval of Minutes

20. RW noted that the Terms of Reference were approved at the March GCRP and were being presented to the DCRP on 28 March. The Workgroup suggested a couple of minor changes to the ToR which RJ agreed to implement ahead of the DCRP.
21. The Workgroup approved the minutes for publication subject to some suggested changes.
22. The Workgroup discussed the actions, details of which are contained within the action log.

8 Agree Actions

23. The Workgroup agreed the actions
24. RJ noted that these would be circulated in an action log.

9 AOB

25. None