

Grid Code Workgroup Consultation Response Proforma

GC0105 - System Incidents Reporting

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5pm on 20 December 2018** to grid.code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Matthew Bent at matthew.bent@nationalgrid.com

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| Respondent: | Alan Creighton |
| Company Name: | Northern Powergrid |
| Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries) | <p>Northern Powergrid support the Original proposal with a 250MW threshold on the basis that :</p> <ul style="list-style-type: none"> • If the threshold had been set at 600MW in the past, 6 events wouldn't have been reported • NGET already produce data re losses of <600MW e.g. information presented at the Operations Forum • Other transmission system operators e.g. EirGrid publish data for losses <600MW • As the system becomes increasing fragile then smaller losses may have a bigger impact on the total system than in the past. |

Standard Workgroup Consultation questions

| Q | Question | Response |
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| 1 | Do you believe that GC0105 Original proposal, the proposed alternative in Annex xx or any potential alternative that you may wish to suggest better facilitates the Grid Code Objectives? | <p><i>For reference the applicable Grid Code objectives are:</i></p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p>The Original Proposal and the Alternative both have a positive impact against this Grid Code Objective as they provide a mechanism for early identification of potential problems so that they can be considered and addressed early.</p> |

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| | | <p><i>(ii) to facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);</i></p> <p>The Original Proposal and the Alternative both have a neutral impact against this Grid Code Objective.</p> <p><i>(iii) subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;</i></p> <p>The Original Proposal and the Alternative both have a positive impact against this Grid Code Objective as they provide a mechanism for early identification of potential problems that, if not addressed could result in healthy plant disconnecting from the system resulting in loss of supplies. Early identification of any such issues would enable them to be addressed in an efficient and co-ordinated way.</p> <p><i>(iv) to efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</i></p> <p>The Original Proposal and the Alternative both have a neutral impact against this Grid Code Objective.</p> <p><i>(v) To promote efficiency in the implementation and administration of the Grid Code arrangements.</i></p> <p>The Original Proposal and the Alternative both have a positive impact against this Grid Code Objective as they provide clarity that a System Incident Report should be published.</p> |
| 2 | Do you support the proposed implementation approach? | Introducing a requirement to produce a System Incident Report in order to provide certainty that such a report is produced is a reasonable suggestion. The implementation timescale should be agreed in the WG, considering the time of the year when most |

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| | | indents tend to occur and the time taken to produce the report, so that an informative report can be published as soon as possible. The agreed timescale should be codified in the legal text. |
| 3 | Do you have any other comments? | No |
| 4 | Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider? | No |

Specific GC0105 questions

| Q | Question | Response |
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| 5 | Do you agree that the proposed contents of an annual System Incident report including the associated data on the National Electricity Transmission System (as listed on page 9) includes the necessary items and, if not, are there any items that you would include/exclude/amend? | Yes |
| 6 | Do you agree that such a System Incident report will be a useful report for industry to help improve system resilience? | Yes |
| 7 | Do you consider this to be a useful report for your purposes? If yes please provide, where possible, any examples of what you might use it for. | As a DNO, the report will assist NGENSO and Network Operators monitor the significant incidents on the transmission system and provide an early warning if certain Grid Code and / or Distribution Code requirements need to be reassessed. This will be particularly important as the transmission and distribution systems (together with the load and generation connected to them) changes as GB moves towards a low carbon economy. |
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| | Legal text comments | |
| | <i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space</i> | The complete legal text based on the content of Section 3 / Annex 4 still needs to be developed by the WG. This should clarify the part of the Grid Code where the obligation should be codified, and include |

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| | <p><i>provided on the response proforma. These will then be discussed at the next Workgroup, following the closure of this Consultation.</i></p> | <p>the implement arrangements. In Appendix 4, there is a suggestion that the proposed legal text could be included in the General Conditions, however as the General Conditions apply to all users and this new obligation applies to The Company, this is probably inappropriate.</p> |
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