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

Respondent:	*Simon Sheridan*
Company Name:	*National Grid – Electricity System Operator*
Please express your views regarding the Workgroup Consultation, including rationale. **(Please include any issues, suggestions or queries)**	*National Grid have for at least 10 years provided an annual report to the Grid Code Panel summarising major events on the system and particularly frequency excursions. The original reason for producing the report was associated with issues to do with Rate of Change of Frequency (RoCoF) protection settings (as used by embedded generators to detect islanding but which led to nuisance tripping with decreasing system inertia). With the workgroup that progressed the necessary changes to the Grid Code (GC0035) now complete and changes to the Distribution Code also nearing completion the ESO questioned what continued use the report was to the Panel, as the Panel is the industry decision-making body for the Grid Code and does not have a remit to oversee system operation.* *The original proposal also adds significantly to the historic report while the alternative raised by the ESO is closer to the report that has been produced previously.* *The ESO does use the information from the original report in their own internal system monitoring and it would be more appropriate to include this report in the SOF (System Operability Framework) where all stakeholders can see it. Whilst we would support the ESO alternative over the original proposal, our overall view is that the modification is not required due to the benefits for the Panel and industry not clearly quantified and monitoring of system operation not being part of the Panel's role.*

	In addition, codifying the detail of a report of this nature removes all future flexibility or innovation and means that any future changes to the report would also need to be progressed through further Grid Code changes which is not proportionate or efficient.

Standard Workgroup Consultation questions

Q	Question	Response
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?	*(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;* *(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);* *(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;* *(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* *(v) To promote efficiency in the implementation and administration of the Grid Code arrangements.* *We don't believe the original or alternative proposals better facilitate any of the Grid Code objectives as the reason that the report was originally produced has now passed and continued monitoring is not part of the Panel's role. The original proposal also requests significant further data and information over and above the original report and in designating the exact detail of the report removes any future flexibility.* *RoCoF and inertia data is captured internally by NGESO in their role as the system operator to help*

		maintain and operate the system, and the NGESO is happy to share this information informally with all Users rather than just the Panel through the System Operability Framework without a code obligation.
2	Do you support the proposed implementation approach?	*Yes. We support the proposed implementation if this code modification is approved. However, we do not feel that a codified solution is appropriate for the reasons above*
3	Do you have any other comments?	*No*
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	*We have already raised an alternative that proposes a solution very similar to the report as has been provided historically.*

Specific GC0105 questions

Q	Question	Response
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?	*The principle of including the exact detail of all items required in this report is not sensible or futureproof.* *Specific items from the original proposal that have been excluded or amended in the ESO alternative are as follows:* - *A loss of infeed or exfeed (import or export including generation, demand and interconnection) of =>250MW.* ***(the alternative chooses 600MW. 250MW will capture much larger numbers of events that have very minor system impact)*** - *Produce the report on the National Grid website.* ***(the alternative suggests just providing the report to the Grid Code Panel but as suggested above a better home could be the SOF)*** - *Include a section in the System Incidents Report outlining progress towards reporting events and associated data on the National Electricity Transmission System including:* • *three phase fault;* • *three phase to earth fault;* • *Phase to phase faults* • *Phase to earth faults*

		• *The associated voltage dips – durations and spreads.* • *Over-voltages;* • *Under-voltages* • *voltage dips of >50%;* • *lightning strikes.* ***(This would appear to be a TO rather than SO function; it is unlikely that all of this data is available to the SO directly. If placing reporting obligations on each of the TOs this should be done in the STC rather than the Grid Code. The value or relevance of this addition to the report has also not been demonstrated)***
6	Do you agree that such a System Incident report will be a useful report for industry to help improve system resilience?	*No, for the reasons stated in our previous answers. Codifying this will also remove future flexibility and mean that any future amendments to the report will also require Grid Code changes.*
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.	*The information from this report is useful to the ESO, but it doesn't fall under the remit of the Panel to monitor system operation. It is unclear what actions any industry parties could take from the report.*
	Legal text comments	
	If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the next Workgroup, following the closure of this Consultation.	