

1 Grid Code Industry Consultation Response Proforma

GC0107 / GC113: The open, transparent, non-discriminatory and timely publication of the generic and/or Power Generating Module specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the Requirements for Generators (GC107) and Demand Connection Conditions (GC113)

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 **06 September 2019** to Grid.Code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

Any queries on the content of the consultation should be addressed to Paul Mullen at paul.j.mullen@nationalgrideso.com

These responses will be considered by the Workgroup at their next meeting at which members will also consider any Workgroup Consultation Alternative Requests. Where appropriate, the Workgroup will record your response and its consideration of it within the Final Workgroup Report which is submitted to the Grid Code Review Panel.

Respondent:	<i>Mike Kay mikekay@p2analysis.co.uk</i>
Company Name:	<i>P2 Analysis</i>
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i></p> <p><i>(b) Facilitating effective 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><i>(c) 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><i>(d) To efficiently discharge the obligations imposed upon the licensee by this license licence and to comply with the Electricity Regulation and any relevant legally binding decisions of the European</i></p>

	<p><i>Commission and/or the Agency; and</i></p> <p><i>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p>
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Standard Workgroup consultation questions

Q	Question	Response
1	Do you believe that GC0107/113 Original proposal better facilitates the Applicable Grid Code Objectives?	No. It is neutral for (a) to (c) above, detrimental to objective (d) and particularly detrimental to (e) above.
2	Do you support the proposed implementation approach?	No
3	Do you have any other comments?	<p>Yes. This modification proposal aims to achieve two distinct things. The first is to create a GB specific listing of all the values and settings that were needed to be determined for the implementation of the RfG in GB. At the time this was raised by the Proposer, in November 2017, there was arguably some merit in this as the GB values had not then been finally determined – although as soon as they were determined, they were published in the Grid Code (and EREC G99), thus negating the need for this first part of the proposal.</p> <p>The second part of the proposal is to try to track variations either within the allowed range of these values and settings, or deviations from them. In contemplating the usefulness of this second part it is instructive to recognize that as far as transmission connected generation is concerned, the RfG introduces very few new requirements; it mainly requires existing GB requirements to be restated in a RfG consistent manner. So if there was any value in the tracking of variations in these issues on a case by case basis this presumably would have been raised in the past.</p> <p>The reality is that there is little variation in the application of requirements. Certainly for generation connected to the distribution system under G99 there is almost nothing that can be determined on a site by site basis that is not included in the published standard ranges. There is no value in stating on a case by case basis where in these standard ranges a particular installation is required to operate.</p> <p>Cases where values outside of these ranges are required can only be applied with a derogation – which will be a matter of public record in any event.</p>

Q	Question	Response
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No – although we know that one WG member has drafted two alternatives for the WG to consider in due course. We support both of these (at least at this draft stage) as being preferable to the original proposal, although both are inferior to the current baseline.

Specific questions for GC0107 & GC0113

Q	Question	Response
5	Do you believe that the obligation to track variations from standard parameters should be placed on the 14 ¹ Distribution Network Operators (DNOs) (as opposed to just the ESO) for distributed generation, and do you believe the obligation should also be extended to the 13 ² Independent DNOs (IDNOs) for the generation connected to their networks? In this latter case, how do you think the obligation on the IDNOs should be imposed?	No to both questions. However this is not really two questions. DNO and IDNOs have the same legal standing in every respect so the application cannot distinguish between them.
6	This modification imposes a new requirement on DNOs for them to share some limited technical data from individual distribution connected customers' connection agreements with the ESO in an anonymous form or with Ofgem (if they request it). Do stakeholders have any views on this, and in particular how distribution connected customers can be made appropriately aware of the proposal?	No comment.

¹ Eastern Power Networks Plc; Electricity North West Limited; London Power Networks Plc; Northern Powergrid (Northeast) Limited; Northern Powergrid (Yorkshire) Plc; Scottish Hydro Electric Power Distribution Plc; South Eastern Power Networks Plc; Southern Electric Power Distribution Plc; SP Distribution Plc; SP Manweb Plc; Western Power Distribution (East Midlands) Plc; Western Power Distribution (South Wales) Plc; Western Power Distribution (South West) Plc; and, Western Power Distribution (West Midlands) Plc.

² Energy Assets Networks Limited; Energetics Electricity Limited; ESP Electricity Limited; Fulcrum Electricity Assets Limited; G2 Energy IDNO Limited; Harlaxton Energy Networks Limited; Independent Power Networks Limited; Leep Electricity Network Limited; Murphy Power Distribution Limited; The Electricity Network Company Limited; UK Power Distribution Limited; Utility Assets Limited; Vattenfall Network Limited according to the public list on Ofgem's website <https://www.ofgem.gov.uk/electricity/distribution-networks/connections-and-competition/independent-distribution-network-operators>

Q	Question	Response
7	How often should the additional technical data be a) updated and b) published following bilateral agreement between network operator and User of site specific values – daily, weekly, monthly, quarterly, six monthly, annually?	Given the limited real value of this information, annually, as part of other annual data submissions etc, would be appropriate.
8	How do you feel you will benefit from this proposed modification – please quantify benefit where possible? The Workgroup would particularly like to hear from manufacturers on this point?	We can see no benefit and note that the WG has been unable to receive any positive support from manufacturers so far.
9	What costs and/or risks do you believe would arise from implementing this proposed modification – please quantify these where possible?	The implementation costs are low. However the incidence of having anything definite to report will be so low that those involved/responsible for the reporting are likely to overlook the requirement, or for it to be done late. This will expose them to the risk of non-compliance with a code requirement. The administrative procedures to manage this will be out of proportion to any value.
10	The code mapping spreadsheet produced as part of the GB implementation of the European Connection Codes (RfG, DCC and HVDC) includes all Grid Code references where settings required by RfG etc. were made. An ENTSO-E implementation monitoring spreadsheet ³ has also been produced showing the settings made in each member state. What additional value does this modification proposal deliver?	None.

³ ENTSO-E implementation monitoring spreadsheet can be found at:

https://docstore.entsoe.eu/_layouts/15/download.aspx?SourceUrl=https://docstore.entsoe.eu/Documents/Network%20codes%20documents/CNC/CNC_Non_exhaustive_requirements.xlsm

Q	Question	Response
11	<p>How do you believe the template, which is being consulted on in spreadsheet form (Annex 1) for convenience should be incorporated into the Grid Code legal text? The options include converting it into a plain document table and including it in the Data Registration Code in line with all other formal data requirements, or somehow referring in the legal text to governed version of the spreadsheet. The Workgroup would be pleased to hear views on the balance of the certainty and rigour of the governance of the requirements versus simplicity?</p>	<p>The large spreadsheet must be boiled down to a textual table that can be included as text in the Grid Code legal text, just like any other Grid Code data requirement.</p>
12	<p>Do you agree that this requirement should be drafted as a new Grid Code section (i.e. OC3) or would it be better to accommodate in the Planning Code alongside similar data?</p>	<p>The logical place to put this is in the annex to the Panning Code – PC.A.3. There is not logic to putting this planning data requirement into a new operating code; it is not even an operational matter.</p>