

Grid Code – Code Administrator Consultation Response Proforma

GC0107 & GC0113 seek to publish generic and/or specific values in connection agreements stemming from the Requirements for Generators (GC0107) and the Demand Connection Code (GC0113).

Industry parties are invited to respond to this Code Administrator 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 **5:00pm** on **6 March 2020** to grid.code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Draft Final Modification Report to the Grid Code Review Panel.

These responses will be included within the Final Modification Report which is submitted to the Authority.

Respondent:	<i>Tim Ellingham</i>
Company Name:	<i>RWE Supply and Trading</i>
<p>Please express your views regarding the Code Administrator Consultation, including rationale.</p> <p>(Please include any issues, suggestions or queries)</p>	<ul style="list-style-type: none"> (a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity (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); (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; (d) 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 (e) To promote efficiency in the implementation and administration of the Grid Code arrangements

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GC0107 Code Administrator Consultation questions

Q	Question	Response
1	<p>Do you believe GC0107 or any of the WAGCMs proposed better facilitate the Grid Code Objectives?</p> <p>Please include your reasoning.</p>	<p>We believe all the proposed solutions better fulfil the Grid Code objectives, however the original stays truer to the underlying EU base code as it encompasses all Users of the Grid Code including the DNO companies. With the increase in embedded generation we feel that there should be a degree of cross-code requirements with the Distribution Code. The same transparency should be available for all Power Generating Facilities/Modules regardless of their connection point.</p>
2	<p>Do you support the proposed implementation approach?</p>	<p>We support the original approach.</p>
3	<p>Do you have any other comments in relation to GC0107?</p>	<p>If it is felt that supplying the proposed information is too onerous on DNOs then a subset of PGM/PGFs can be based on those PGM/Fs with BEGAs or Medium sized and above.</p> <p>Throughout the workgroups there was always the question of what parameters may be different between BCAs. One area where we have seen a lack of standardisation is in offshore windfarm BCAs in relation to the reactive power requirements and capabilities at those sites. With the variations on reactive build options there are inherently different values for each site, but to understand the system and associated ancillary service requirements better, the visibility of this data would assist in build decisions.</p>

GC0113 Code Administrator Consultation questions

Please fill in with any different answers for GC0113 or indicate if your answers to GC0107 are equally applicable to GC0113.

Q	Question	Response
4	<p>Do you believe GC0113 or any of the WAGCMs proposed better facilitate the Grid Code Objectives?</p> <p>Please include your reasoning.</p>	<p>As with 107 we feel that transparency should be available from all users of the Grid Code and the National Electricity Transmission System whether directly or indirectly.</p> <p>All proposals better facilitate the Grid Code objectives.</p>
5	<p>Do you support the proposed implementation approach?</p>	<p>We support the original proposal</p>
6	<p>Do you have any other comments in relation to GC0113?</p>	<p>In slight contrast with 107 we feel there should be a threshold on information provision from demand sites as a function of connection voltage and/or power consumption.</p>