Code Administrator Consultation Response Proforma

GC0141: Compliance Processes and Modelling amendments following 9th August Power Disruption

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 to grid.code@nationalgrideso.com by **5pm 08 July 2022**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Jennifer Groome Jennifer.groome@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Alastair Frew
Company name:	Drax
Email address:	Alastair.frew@drax.com
Phone number:	07730697290

I wish my response to be:
(Please mark the relevant box) ☒Non-Confidential ☐Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable Grid Code Objectives are:

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*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions							
1	Do you believe that the Original Proposal and WAGCM1-14 better facilitates the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:					
		Original	☐A	☐B	☐C	☐D	☐E
		WAGCM1	☐A	☒B	☐C	☐D	☐E
		WAGCM2	☒A	☒B	☒C	☐D	☐E
		WAGCM3	☐A	☐B	☐C	☐D	☐E
		WAGCM4	☒A	☒B	☐C	☐D	☐E
		WAGCM5	☒A	☒B	☒C	☐D	☐E
		WAGCM6	☐A	☒B	☒C	☐D	☐E
		WAGCM7	☐A	☒B	☐C	☐D	☐E
		WAGCM8	☒A	☒B	☐C	☐D	☐E
		WAGCM9	☐A	☐B	☐C	☐D	☐E
		WAGCM10	☐A	☐B	☐C	☐D	☐E
		WAGCM11	☒A	☐B	☐C	☐D	☐E
		WAGCM12	☒A	☐B	☐C	☐D	☐E
		WAGCM13	☒A	☒B	☐C	☐D	☐E
		WAGCM14	☒A	☒B	☐C	☐D	☐E
		This table does not completely express a party's views as it only permits parties to indicate which objectives, they believe the Original or any of the WAGCMs provides a positive impact by placing a x in the box. Unfortunately, in terms of the other objectives, it is unclear as to whether an unchecked box means the Original or any of the WAGCMs has a negative impact or has no impact and is therefore neutral. For the avoidance of doubt in this case we believe neither the Original nor any of the WAGCMs have any impact on objectives D and E and are hence neutral to these objectives. In terms of objectives A, B and C the non-checked boxes we believe for the Original and WAGCMs have significant negative impacts on these objectives, due to the retrospective aspects of these proposals. We believe from the limited options currently available only WAGCM2 & WAGCM5 do not place					

		significant retrospective obligations on existing Users with WAGCM2 being the preferred option. The key significant retrospective aspects which concern us are:- 1) **The Addition of a new paragraphs to CC.6.3.15 and ECC.6.3.15** The Proposer is suggesting that the new text (see below) being added to CC.6.3.15 and ECC.6.3.15 are just clarifications, however we believe these are new retrospective requirements being applied to all Users. *"For the avoidance of doubt, for up to 30 minutes following such a fault or disturbance **Generating Units**, **Power Park Modules**, **DC Converters** and **OTSDUW Plant and Apparatus** are required to remain connected and stable provided system operating conditions have returned within those specified in CC.6.1."* This is adding a requirement that a Unit must stay connected for 30 minutes following a fault or disturbance, now assuming it doesn't mean ignoring PNs and BOAs (but as drafted it doesn't say that), nor is it intended to remove the dispensations of (E)CC.6.3.15.3, it now says units shall not trip off no matter the circumstances if there has been a fault or disturbance within the last 30 minutes. This additional requirement is a safety concern as currently operators are permitted to trip or shutdown units whenever a plant or apparatus moves into an unsafe operating condition. Whilst these events might have nothing to do with the fault or disturbance and could be permitted by drafting changes to the proposed text, there is still the possibility that the event has been caused by the fault and tripping needs to be permitted. For example there are stations which can become completely disconnected from the main transmission system due to lightning strikes on the transmission system, these unit have to trip on overspeed protection in this situation. Similarly, a system fault could initiate an internal fault in an existing item of apparatus such as an ageing transformer which again would be required trip. This proposed change appears to be creating a situation where the transmission system faults are seen dangerous and need to be cleared but other faults on other party's assets are not as important and should not be cleared. Whilst that was the main issue, there are also issues with what is defined as a fault or disturbance to start the 30 minute clock ticking. Is it a fault anywhere on the transmission network?

		Does the voltage at my connection point have to drop below 0.9 pu? or what? Currently it is accepted that it is not in a party's commercial interest to trip off unplanned and they with incur out of balance costs, however modification appears be making tripping a compliance issue with the arbitrary timing of system fault events determining their seriousness. **2) The deletion of the completion date from paragraph PC.A.5.3.2(g)** *"Generating Unit Mechanical Parameters* *It is occasionally necessary for The Company to assess the interaction between the Total System and the mechanical components of Generating Units. For Generating Units (including Synchronous Generating Units within a Synchronous Power Generating Module) ~~with a Completion Date on or after 01 April 2015,~~ the following data items should be supplied:"* Retrospective application of this requirement can be very difficult and costly, even if the OEM exists. Under the current requirement this data can be requested (we believe at the cost of the party requesting the data), but it can take years to manage to get the OEM interested in looking thought their archives to start to do the calculations. What will happen to existing Users who find themselves in the position they are unable to obtain this data? The current arrangements are better as the process to obtain data is only started if it is identified that data is required, however under the proposed new arrangements parties could be involved in a very difficult process to obtain data which may never be used. Other issues and comments. We do not see any benefit of introducing the Independent Engineer and believe the ESO should still be carrying out the compliance process as at the end of the day it is their duty. Introduction of a third-party Independent Engineer into this process should be avoided at it will just add complication to the process. If the ESO requires additional assistance in assessing compliance due to technical difficulties in understanding the data supplied by the User then the ESO can employ an Independent Engineer.

2	Do you support the proposed implementation approach?	☒Yes ☐No Click or tap here to enter text.
3	Do you have any other comments?	This an extremely complicated modification which can be considered as 7 separate independent modifications. Originally the workgroup had decided to treat this modification as these 7 independent modifications and voted on each independently on their individual merits. However, Code Admin decided after the Workgroup vote this approach was not acceptable and the Workgroup was reconvened and the limited 14 WAGCMs were derived based on the individual voting of each workgroup member in the previous individual section votes and the Workgroup members then voted on these revised WAGCMs. We are concerned that recombining the 7 separate modifications into the single modification with a limited number of 14 alternatives is now creating a situation where there are now artificial linkages being created between different sections of the modification. This potentially raises the issue that it might not be possible to independently assess the independent aspects of this modification and the best option for industry might not be one of the 15 options available to the Authority to choose.