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:	Mike Kay
Company name:	P2 Analysis
Email address:	mikekay@p2analysis.co.uk
Phone number:	01204 888576

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
		All the solutions better facilitate the objectives better than the original, but it is not really possible or practical to use the high level objectives to rank the WAGCMs.					
2	Do you support the proposed implementation approach?	☐Yes ☒No					
		WAGCM 14 would seem to be the most pragmatic. However it is hard to agree to the implementation when its applicability to embedded medium power stations is unclear, and there has been no discussion of applicability in the WG or CA consultation papers. It seems that the revised CC 6.3.15 will apply to any existing LEEMPS. It is not reasonable to impose these new requirements re fault ride through retrospectively to LEEMPS. There is no explanation in the consultation of how these new requirements can be achieved with					

		existing plant. The proposed new text in CC.6.3.15 should therefore not be implemented. DNOs will need to implement the new PC.A.5.3.2 – which means implementing PC.A.9 -but PC.A.9 does not include any embedded plant within it scope – so presumably this means NGESO does not expect these models from LEEMPS? It seems that PC.A.9 does not apply to LEEMPS, and similarly that the new CP8 and ECP8 do not apply either – but we believe this needs to be clearer in the legal text.
3	Do you have any other comments?	No.