

**Code Administrator Consultation Response Proforma****CM085: To Clarify OFTO reactive power requirements at <20% output**

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 [stcteam@nationalgrideso.com](mailto:stcteam@nationalgrideso.com) by **5pm on 26 October 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 Sally Musaka [Sally.musaka@nationalgrideso.com](mailto:Sally.musaka@nationalgrideso.com) [stcteam@nationalgrideso.com](mailto:stcteam@nationalgrideso.com)

Respondent details	Please enter your details
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**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 STC Objectives are:**

- a) *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- b) *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- c) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- d) *protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*
- e) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

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

Standard Code Administrator Consultation questions									
1	<p>Do you believe that the Original Proposal better facilitates the Applicable Objectives?</p> <p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1" data-bbox="619 454 1573 510"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/> A</td> <td><input checked="" type="checkbox"/> B</td> <td><input type="checkbox"/> C</td> <td><input checked="" type="checkbox"/> D</td> <td><input type="checkbox"/> E</td> <td><input type="checkbox"/> F</td> <td><input type="checkbox"/> G</td> </tr> </table> <p>This modification addresses an area of uncertainty in the STC regarding the operational availability to the ESO of reactive equipment owned by OFTOs during periods of low windfarm output.</p> <p>The STC section K states currently that below 20% windfarm output reactive capability may still be available. It is unclear what this means, but on occasion having access to available capability would be useful operationally to the ESO and would avoid the ESO having to take costly alternative operational actions or triggering further system reinforcements. This scenario has been experienced by the ESO on several occasions and the uncertainty also leads to increased risk and expenditure.</p> <p>A clarification has therefore been added to both annexes 1 and 2 of section K covering pre- and post-RfG plant to note that available capability may be instructed by the ESO but is subject to a pragmatic and agreed assessment of the impact on such equipment.</p> <p>The text as discussed with OFTOs is intended to allow this agreement and had been amended from the original proposal with this in mind. It is clear however that where a TO or OFTO owns equipment that forms part of its RAB and therefore contributes to its regulated income, generally this should be available when required unless there is a good reason.</p> <p>The particular scenario that is envisaged is high voltage at an OFTO onshore substation. OFTOs have expressed that dynamic compensation equipment often has availability issues and requires regular maintenance, therefore they have reservations about this being generally available when the windfarm is not running since it forms part of their compliant connection. The aim during a high voltage situation however is really to utilise available static compensation (ie reactors). These have fewer maintenance issues and a compliant connection will usually use elements of static and dynamic compensation equipment, so bearing this scenario in mind the proposed solution is a reasonable compromise in highlighting the issue, making clear the ESO's requirement, but still allowing OFTOs where justified to avoid undue costs.</p>	Original	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G
Original	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/> E	<input type="checkbox"/> F	<input type="checkbox"/> G		

		<p>It is certainly not the intention that this modification amends the absolute technical requirements of OFTO equipment or triggers any further investment but just opens a dialogue to use the equipment that has already been installed efficiently in managing the system.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
3	Do you have any other comments?	<p>The words '<i>and, if applicable, as instructed by The Company</i>' should be added to the legal text change in section K annex 1 clause 2.4.1 to match the planned addition to annex 2 clause 1.3.2.1. This is a minor version control error that has come about during the discussions and amendments carried out with the OFTO representatives.</p>