DECC/Ofgem Stakeholder Workshop:
Issue Log for the HVDC Network Code

Last Updated: 17 July 2015

Prior to the European Cross Border Committee meeting on 23 July, DECC and Ofgem requested stakeholder comments on the HVDC Code based on the version dated 08 July 2015. This document summarises the issues captured in written comments before the stakeholder workshop on 16 July and any additional comments raised at the meeting.

This is a summary of the key issues raised by GB stakeholders and is not a detailed issue log capturing all the details submitted or discussed on the day.

This document will be published on the Joint European Stakeholder Group (JESG) website.

Issue Priority (where indicated)	Description of your priority HVDC comments	Impact and evidence
High	A number of issues have been observed with certain technical data in the code – specifically: Annex IV table 6 – Max steady state voltage should be changed from 0.1pu to 0.225pu Article 18 – should lesser voltage variations be permitted in addition to existing draft for wider variations Annex VII – the voltage ranges as drafted in HVDC may prove onerous for offshore wind farm developers, and are more demanding that existing requirements under the Grid Code	
High	Article 73 – Non-binding guidance. By virtue of being mentioned in the code, this could be said to give this guidance a special status. There are concerns over how the TSO might make use of this, as well as the process for developing it and lack of regulatory approval.	Concern that TSO might use this guidance in a way that makes it mandatory for other operators, but has the discretion over how it applies it to its own infrastructure.
High	Article 8 – the requirement for public consultation should be extended to all decisions on application of the code made by all TSOs	
High	A concern that the frequency ranges in Article 11(1), Annex 1, Table 1 are biased towards the use of HVDC-VSC systems and that it might make compliance very difficult for any HVDC-LCC systems	

High	Clarity was sought over the applicability of the code to TSO embedded HVDC systems – article 2(7) seems to suggest that these could be excluded from compliance requirements without any obvious justification. This could be expanded to a broader question over whether TSOs had exemption from a number of compliance requirements. It was suggested that the TSOs requirement to comply with the grid code as part of their licences might address this issue.	
High	Article 54(5) – Unreasonable requirement to provide a replica control system to TSO on request. Either remove clause, or require TSO to pay for it and hence have to justify expense to regulator.	Potential to be an expensive requirement with little obvious benefit
Medium	There are a number of defined terms in this and other codes which are identical to existing grid code terms (.e.g 'Interface Point')	May cause confusion over application of the code, particularly between 'existing' and 'new' systems. Equally some of these terms may be used in bilateral contracts, which might need changing for clarity.
Low	Articles 57(5), 62(4) and 68(6) – Is 24 months a sufficient period for an ION? Potential for developer to be stuck in ION due to lack of action by TSO.	
Low	Article 68(1) – requirements for regular assessment. Lack of clarity around what constitutes 'regular', and why this requirement is necessary.	Excessive cost to developer stemming from needless assessments; and potentially resource intensive for Relevant System Operator if passive monitoring is not permitted
Low	Article 4(1)(a) – Guidance is needed on what constitutes 'modified to such an extent' and who determines this, such that a revision to connection agreements would be required. Is this the TSO?	
Low	Article 54 – there should be an obligation on the relevant TSO to provide appropriate data and models to enable simulations to be undertaken.	Suggest that code is revised to use the wording in DCC, where this is addressed