# NETS SQSS and Grid Code Industry Consultation Response Proforma

**GSR016 Small and Medium Embedded Generation Assumptions**

## Views are invited upon the proposals outlined in this consultation, which should be received by 08 January 2018.

## Your formal responses may be emailed to box.SQSS@nationalgrid.com.

## The proposals set out in this consultation are intended to better meet the NETS SQSS Objectives. To achieve this, they are intended to facilitate efficient and economic connection arrangements whilst ensuring there is no impact on the safety and security of the transmission system.

## These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

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| **Respondent:** | *Please insert your name and contact details (phone number or email address)* |
| **Company Name:** | *Please insert your Company Name* |
| 1. **Do you agree with the general approach of treating Small, Medium and Large Power Stations consistently in the NETS SQSS planning studies irrespective of whether they are connected to the transmission system or embedded within a distribution system?**
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| 1. **Do you believe that GSR016 better facilitates the appropriate NETS SQSS objectives?**
 | *For reference the applicable NETS SQSS objectives are:**(i) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;**(ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;**(iii) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and**(iv) facilitate electricity Transmission Licensees to comply with their obligations under EU law.* |
| 1. **Do you generally support the modifications proposed by the workgroup? If not, please clarify your concerns.**
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| 1. **Do you agree that the current treatment of embedded Small Power Stations and embedded Medium Power Stations in the NETS SQSS under the security background conditions could lead to a transmission system that could unduly restrict this embedded generation from supplying the demand?**

**If not, please clarify why.**  |  |
| 1. **Do you agree that the current treatment of embedded Small Power Stations and embedded Medium Power Stations in the NETS SQSS under the economy and background conditions could lead to a transmission system that could lead to an investment that is neither economic nor efficient?**

**If not, please clarify why.**  |  |
| 1. **Are there any other issues that could arise due to the current methodology of accounting for embedded generation in investment planning studies?**

**If yes, please clarify what these are.**  |  |
| 1. **The Workgroup has based their conclusions on a set of assumptions (Paragraphs 4.20 to 4.30). Do you agree with these assumptions? If not, what would be the impact on the proposal?**
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| 1. **Does the modification proposed mitigate the risks identified?**

**If not, please clarify where it fails to do so and how could these issues be addressed.** |  |
| 1. **The data provided under the Grid Code is generally not sufficient to allow Transmission Licensees to fully meet the modifications proposed. The workgroup has identified an interim arrangement assuming that a subsequent change to the Grid Code will provide the additional data. Do you agree with these arrangements? If not, please clarify the risks envisaged and the potential solutions.**
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| 1. **Do you agree with the view taken by the workgroup that the NETS SQSS, in its current state, provides enough justification to any additional reinforcements and/or operational measures where these are required to manage the system in the absence of sufficient participation in the Balancing Mechanism?**

**If not, please clarify the reasons.** |  |
| 1. **Are there any further technical considerations that need to be taken into account?**
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| 1. **Please provide any other comments you feel are relevant to the proposed changes.**
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## If you wish to submit a confidential response please note the following:

##### Information provided in response to this consultation will be published on National Grid’s website unless the response is clearly marked “Private and Confidential”. We will contact you to establish the extent of the confidentiality. A response marked “Private and Confidential” will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the NETS SQSS Review Panel and/or Grid Code Review Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

##### Please note an automatic confidentiality disclaimer generated by your IT System will not in itself mean that your response is treated as if it had been marked “Private and Confidential”.