

Grid Code Workgroup Consultation Response Proforma

GC0125 'EU Code Emergency & Restoration: Black Start testing requirements for Interconnectors, HVDC System Owners and Owners of Transmission DC Converters'

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 by **12 July 2019** to christine.brown1@nationalgrideso.com Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Chrissie Brown at christine.brown1@nationalgrideso.com

These responses will be considered by the Workgroup at their next meeting at which members will also consider any Workgroup Consultation Alternative Requests. Where appropriate, the Workgroup will record your response and its consideration of it within the final Workgroup Report which is submitted to the Grid Code Review Panel.

Respondent:	Alastair Frew
Company Name:	Drax Generation Enterprise Ltd
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p>(a) <i>To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i></p> <p>(b) <i>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);</i></p> <p>(c) <i>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;</i></p> <p>(d) <i>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</i></p> <p>(e) <i>To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p>

Standard Workgroup consultation questions

Q	Question	Response
1	Do you believe that GC0125 Original proposal, better facilitates the Grid Code Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes, as this now implements changes to allow HVDC systems to be providers of Black Start services and going forward makes it easier in future for other parties to provide such services with minimum code changes.
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No

Specific questions for GC0125

Q	Question	Response
5	Do you believe the Black Start testing requirements set out in the draft legal text at OC5.7.1(a) – (e) accurately reflects the testing requirements and adequately distinguishes the obligations between Black Start Power Stations and Black Start HVDC Systems acknowledging that there are differences between them on the basis of their technology. Please provide your rationale bearing in mind a power station could be made up of a number of Black Start Generating Units whereas as Black Start HVDC System would apply to each HVDC System.	Yes as Generators and HVDC are both required to carry out 3 yearly tests.

6	<p>Do you have any comments on the proposed legal text in Annex 4 of the consultation?</p>	<p>Definition Block Loading Capability the word “generator” has been change from an undefined term meaning equipment to a defined term “Generator” mean a party whilst all the rest of the text refers equipment and not a party. Should Generator be replaced with Genset?</p> <p>In the Black Start HVDC Systems definition there are 3 types of system listed namely HVDC System or DC Converter Station or Transmission DC Converter but there are only 2 types of owner listed namely HVDC System Owner or DC Converter Station Owner, is this correct? Also whilst there are 3 types of system in the definition only 2 are listed everywhere else throughout the document, again is this correct?</p> <p>Definition Start-Up typo in the first sentence “bringinging”.</p> <p>“ECC.6.3.5.4 Each HVDC System or Remote End HVDC Converter Station” this is a different term from those used previously is it correct?</p> <p>OC5.7.1(a)(i) suggested improvement “In the case of a Generator, The Company may shall require a Generator with a Black Start Station to carry out a test (a either “Black Start Unit Test” or a “Black Start Station Test”) on a Genset in a Black Start Station (a “Black Start Unit Test”) (a “Black Start Station Test”), in order to demonstrate that a Black Start Station has a Black Start Capability.”</p> <p>OC5.7.1(d) suggest this section is removed and OC5.7.1(d)(i) is moved into a new section OC.7.1(b)(iii) and changed as follows “(iii) In the case of the Generator with a Black Start Station, The Company may require the Generator to carry out a Black Start Station Test at any time (but will not require a Black Start Station Test to be carried out more than once in every two calendar years in respect of any particular Genset unless it can justify on reasonable grounds the necessity for further tests or unless the further test is a re-test). If successful this Black Start Station Test shall count as a successful Black Start Unit Test for the Genset used in the test.”. Section OC5.7.1(d)(ii) is as far as I can see basically the same as OC5.7.1(b)(ii) so it does not need replicated.</p> <p>OC9.4.7.2 wording does not flow as written possibly change “Genset, HVDC System, DC Converter Station” to “User’s equipment”.</p> <p>OC9.4.7.4(c) there is a mix of party’s and equipment at one point possible solution as follows “If during the Demand restoration process any Genset or HVDC System or DC Converter Station cannot, because of the Demand being experienced, keep within its safe operating parameters, the Black Start Service Provider shall, unless a Local Joint Restoration Plan is in operation, inform The Company. The Company will, where possible, either instruct Demand to be altered or will re-configure the National Electricity Transmission System or will instruct a User to re-configure its System in order to alleviate the problem being experienced by the Generator Gensets or HVDC Systems or DC Converter Station.”. Equally changing “Generator or HVDC Systems or DC Converter Station” to “Users” might be better.</p>
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