

1 Grid Code Industry Consultation Response Proforma

GC0107 / GC113: The open, transparent, non-discriminatory and timely publication of the generic and/or Power Generating Module specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the Requirements for Generators (GC107) and Demand Connection Conditions (GC113)

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 **06 September 2019** to Grid.Code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

Any queries on the content of the consultation should be addressed to Paul Mullen at paul.j.mullen@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.

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| Respondent: | <i>Garth Graham (garth.graham@sse.com)</i> |
| Company Name: | <i>SSE Generation Ltd.</i> |
| Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries) | <i>(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</i> |

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| | <p><i>Commission and/or the Agency; and</i></p> <p><i>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p> |
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Standard Workgroup consultation questions

| Q | Question | Response |
|---|---|---|
| 1 | Do you believe that GC0107/113 Original proposal better facilitates the Applicable Grid Code Objectives? | Yes, for the reasons we have already set out in the GC0107 and GC0113 proposal forms. |
| 2 | Do you support the proposed implementation approach? | Yes. |
| 3 | Do you have any other comments? | Not at this time. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No. |

Specific questions for GC0107 & GC0113

| Q | Question | Response |
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| 5 | Do you believe that the obligation to track variations from standard parameters should be placed on the 14 ¹ Distribution Network Operators (DNOs) (as opposed to just the ESO) for distributed generation, and do you believe the obligation should also be extended to the 13 ² Independent DNOs (IDNOs) for the generation connected to their networks? In this latter case, how do you think the obligation on the IDNOs should be imposed? | <p>Obligations to track variations should apply to all Relevant System Operators / TSOs etc., as per the requirements set out in the RfG and DCC Network Codes.</p> <p>Furthermore, we struggle to understand how a Relevant System Operator or TSO, exercising ‘good industry practice’³, could meet their obligations both in terms of EU law as well as domestic Licence and Code obligations except by tracking variations, from the standard parameters, that <u>they</u> alone are specifying – if they are not doing this variation tracking, then who do they think is? Indeed, without this variation tracking being recorded how can a Relevant System Operator or TSO assure itself (and the NRA) that customers are complying with what has been specified in terms of variations from the parameters etc., of general application.</p> |

¹ Eastern Power Networks Plc; Electricity North West Limited; London Power Networks Plc; Northern Powergrid (Northeast) Limited; Northern Powergrid (Yorkshire) Plc; Scottish Hydro Electric Power Distribution Plc; South Eastern Power Networks Plc; Southern Electric Power Distribution Plc; SP Distribution Plc; SP Manweb Plc; Western Power Distribution (East Midlands) Plc; Western Power Distribution (South Wales) Plc; Western Power Distribution (South West) Plc; and, Western Power Distribution (West Midlands) Plc.

| Q | Question | Response |
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| 6 | This modification imposes a new requirement on DNOs for them to share some limited technical data from individual distribution connected customers' connection agreements with the ESO in an anonymous form or with Ofgem (if they request it). Do stakeholders have any views on this, and in particular how distribution connected customers can be made appropriately aware of the proposal? | We believe there are likely to be many other items of information that the Relevant System Operators are required, if requested by Ofgem, to share with Ofgem – we do not see this request being any different to those. This proposal, like others that impact on connecting parties and stakeholders more generally, will have been publicised by the relevant Code Administrators in an appropriate way. |

² Energy Assets Networks Limited; Energetics Electricity Limited; ESP Electricity Limited; Fulcrum Electricity Assets Limited; G2 Energy IDNO Limited; Harlaxton Energy Networks Limited; Independent Power Networks Limited; Leep Electricity Network Limited; Murphy Power Distribution Limited; The Electricity Network Company Limited; UK Power Distribution Limited; Utility Assets Limited; Vattenfall Network Limited according to the public list on Ofgem's website <https://www.ofgem.gov.uk/electricity/distribution-networks/connections-and-competition/independent-distribution-network-operators>

³ Defined in the Grid Code as "The exercise of that degree of skill, diligence, prudence and foresight which would reasonably and ordinarily be expected from a skilled and experienced operator engaged in the same type of undertaking under the same or similar circumstances."

| Q | Question | Response |
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| 7 | <p>How often should the additional technical data be a) updated and b) published following bilateral agreement between network operator and User of site specific values – daily, weekly, monthly, quarterly, six monthly, annually?</p> | <p>The information should be updated shortly after it has been produced – delays serves no useful purpose either for the Relevant System Operator or the party wishing to see the information.</p> <p>As we have found with the Relevant Interruption Claim Report (produced by the TSO) delaying its production by weeks or months often leads to information being missed / ‘slipping off the radar’ and not being reported.</p> <p>A far more efficient way is for the Relevant System Operator to amend their existing internal procedures such that once a connection agreement is signed they simply place the relevant date (required by GC0107 or GC0113 to be publicly available) in the public domain shortly thereafter whilst the information and its relevance is still fresh in the mind of the Relevant System Operator’s staff.</p> <p>Delaying this task till weeks or months later requires ‘double handling’ of the information which is wasteful, inefficient and uneconomic. It also results in out of date information being used by stakeholders, which is unreasonable for them.</p> <p>The persons within the Relevant System Operator who should know what the information within the connection agreement is required, by GC0107/GC0113, to be placed in the public domain can easily do this at the time that the information is produced - contemporaneous recording of this information is always preferable to a (much?) delayed recording.</p> <p>Furthermore, if this delayed recording is to be done by staff other than those involved at the time the agreement is signed (and the information thus produced) then this will add extra cost for no discernible benefit to either the Relevant System Operator or the stakeholders seeking this information.</p> <p>Put simply, why wait to record this information? Waiting increases costs, increases the risk of misreporting and decreases the relevance of the information to stakeholders (as it’s not up to date).</p> |

| Q | Question | Response |
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| 8 | How do you feel you will benefit from this proposed modification – please quantify benefit where possible? The Workgroup would particularly like to hear from manufacturers on this point? | <p>[Our answer to Q8 is shown below]</p> |
| 9 | What costs and/or risks do you believe would arise from implementing this proposed modification – please quantify these where possible? | <p>Given the requirement on Relevant System Operators, TSOs and NRAs, set out in Article 7(3)(b), to “ensure transparency” the main risk is non-compliance on the part of a Relevant System Operator or TSO or NRA with the RfG or DCC obligations.</p> <p>Furthermore, given that the Relevant System Operator or TSO will already need to record, for internal purposes; such as the Control Room / DSO functions, their contracts department, their field staff etc.; this information (otherwise there is a risk of them being unable to perform their functions in a safe or economic & efficient manner) we don’t see there being any materially significant additional cost of publishing this information.</p> |

| Q | Question | Response |
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| 10 | <p>The code mapping spreadsheet produced as part of the GB implementation of the European Connection Codes (RfG, DCC and HVDC) includes all Grid Code references where settings required by RfG etc. were made. An ENTSO-E implementation monitoring spreadsheet⁴ has also been produced showing the settings made in each member state. What additional value does this modification proposal deliver?</p> | <p>The GB code mapping spreadsheet is deficient in that (i) it is limited to reporting values / requirements of general application – it does not cover other values or requirements etc., specified by Relevant System Operators in GB and (ii) it is not kept up to date in a timely manner.</p> <p>As the presentation, from the EUTurbines⁵ and EUGINE⁶ organisations, to the September 2019 GC ESC meeting (see our answer to Q8 for more details) identified, the ENTSO-E monitoring spreadsheet has been found to be deficient as it is not comprehensive.</p> <p>The solution set out in the proposed modification will address both these deficiencies; in terms of the GB code mapping and the ENTSO-E monitoring spreadsheet; in a timely and transparent way.</p> <p>This solution will deliver additional value to stakeholders seeking to connect in GB and manufacturers seeking to design / build / commission new plant in GB. Network operators, who do not themselves seek to do this, may not therefore fully appreciate what, from their customers / stakeholders' points of view, are the additional value that this modification proposal delivers.</p> |
| 11 | <p>How do you believe the template, which is being consulted on in spreadsheet form (Annex 1) for convenience should be incorporated into the Grid Code legal text? The options include converting it into a plain document table and including it in the Data Registration Code in line with all other formal data requirements, or somehow referring in the legal text to governed version of the spreadsheet. The Workgroup would be pleased to hear views on the balance of the certainty and rigour of the governance of the requirements versus simplicity?</p> | |

⁴ ENTSO-E implementation monitoring spreadsheet can be found at:

https://docstore.entsoe.eu/layouts/15/download.aspx?SourceUrl=https://docstore.entsoe.eu/Documents/Network%20codes%20documents/CNC/CNC_Non_exhaustive_requirements.xlsm

⁵ EUTurbines – European Association of Gas and Steam Turbine Manufacturers

⁶ EUGINE – European Power Plants Association

| Q | Question | Response |
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| 12 | Do you agree that this requirement should be drafted as a new Grid Code section (i.e. OC3) or would it be better to accommodate in the Planning Code alongside similar data? | |

Q8 How do you feel you will benefit from this proposed modification – please quantify benefit where possible? The Workgroup would particularly like to hear from manufacturers on this point?

As a party seeking to connection in GB at transmission and distribution, we will benefit from the application of the transparency requirements that GC0107 and GC0113 achieve.

Absent of the improvements the proposed modification will introduce there will be no transparency of what the Relevant System Operators etc., in GB are specifying / requiring of GB stakeholders or where those are values or requirements etc.; that are not of general application; can be found.

Therefore, transparency of the technical requirement applicable to parties seeking to connect in GB is the benefit that arises from this proposal.

In terms of the benefits that this proposed modification will provide in terms of manufacturers we would refer you to the joint presentation from the EUTurbines⁷ and EUGINE⁸ organisations (which are amongst the pan European associations that represent manufacturers on the Grid Connection European Stakeholder Committee) to the September 2019 GC ESC meeting, which can be found at:

https://docstore.entsoe.eu/Documents/Network%20codes%20documents/Implementation/stakeholder_committees/GSC/2019_09_11/TOP.4.%20GC%20National%20Implementation%20_joint%20feedback_EUTurbines%20and%20EUGINE.pdf

In particular we'd highlight the comments, on slide 8, that:

“Easy, free and clear access to National/System Operator Specific Rules for Connection to the Grid is needed including compliance process”. [emphasis added]

Slide 8 goes on to say that:

“The monitoring file maintained by ENTSO-E is a good guidance and starting point, but more support from relevant parties as part of the transparency requirements is expected”. [emphasis added]

⁷ EUTurbines – European Association of Gas and Steam Turbine Manufacturers

⁸ EUGINE – European Power Plants Association

Slide 9 makes similar points which we would bring to your attention, noting as it does that “*in order to allow manufactures to fulfil all compliance obligations to respect national rules it is necessary to guarantee....*”

“*Accessibility: All relevant rules should be easily accessible and free for download on the ENTSO-E website or national website*” [emphasis added];

and

“*Coherent Structure: The structure of the national rules should ideally follow the structure of the NC RfG. If that is not the case, a clear reference to the relevant articles in the RfG should be made*”.

We would also highlight the recommendations, from the manufactures, shown on slide 16, that:

“*The process has to be improved to ensure lean and easy access to the information: harmonisation and sharing of information involving stakeholders is a necessity*” [emphasis added];

and

“*All information and associated links should be grouped on a single platform...and information needs kept up to date*” [emphasis added].

In our view a key benefit is that the solution for the proposed modification fully accords with, and fully supports the achievement of, the improvements and recommendations that the manufactures from across Europe (including, but not limited to, GB) have identified recently - just this week - in terms, specifically, of RfG (GC0107) and DCC (GC0113) implementation and compliance.

[end]