

Grid Code Workgroup Consultation Response Proforma

GC0127 EU Code Emergency & Restoration: Requirements resulting from System Defence Plan and GC0128 EU Code Emergency & Restoration: Requirements resulting from System Restoration Plan

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 **16 August 2019** to christine.brown1@nationalgrideso.com

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| Respondent: | <p><i>Antony Johnson</i></p> <p><i>Telephone Number:- 01926 655466</i></p> <p><i>E-Mail:- Antony.Johnson@nationalgrideso.com</i></p> |
| Company Name: | <i>National Grid ESO</i> |
| <p>Please express your views regarding the Workgroup Consultation, including rationale.</p> <p>(Please include any issues, suggestions or queries)</p> | <p><i>(i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i></p> <p><i>(ii) 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><i>(iii) 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><i>(iv) 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><i>(v) To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p> |

Standard Workgroup consultation questions

| Q | Question | Response |
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| 1 | Do you believe that GC0127 and GC0128 Original proposal, better facilitates the Grid Code Objectives? | Yes – in particular (iii) and (iv) in promoting the security of the network (which is the intention of the E&R code), and in complying with European legislation respectively. |
| 2 | Do you support the proposed implementation approach? | Yes |
| 3 | Do you have any other comments? | The production of a System Defence Plan and System Restoration Plan, the minor legal text changes reflected through these modifications GC0127/8 and the further code modifications GC0108 and GC0125 which deal with black start testing requirements are all requirements for GB compliance and implementation of the European Emergency and Restoration Code. The approach that has been taken by NGENSO in developing this work has been one of only making those changes necessary, as originally advised by Ofgem. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No |

Specific questions for GC0127 & 128

| Q | Question | Response |
|---|--|---|
| 5 | Do you think the wording in OC9.2.5 could be improved, if so what do you suggest? Please note that the legal text can be located in Annex 4. | No. The additional wording in OC9.2.5 is for high level clarification purposes only and ensures more effective alignment with the requirements of the European Emergency and Restoration Code. The specific requirements relating to data exchange and information supply are already captured through OC9 and the wider Grid Code processes. |

| Q | Question | Response |
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| 6 | <p>A Workgroup member has an alternate interpretation of what of a SGU, SRP, SDP is as part of the modification and is considering raising an alternative solution; what are your views on this?</p> | <p>We do not agree with the legal interpretation upon which the alternative is based. We have discussed this with NGESO's legal team who agree that the interpretation of the E&R code upon which the GC0127/8 original proposals are based is correct.</p> <p>We believe that this issue is similar in principle to one of the alternatives raised for Grid Code modification GC0106 (Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL)), which sought a wider interpretation of the requirements due to the code beyond the minimum changes specified in the original proposal. In both cases, the alternatives would place additional costs on the industry, especially smaller generators and parties which do not have a CUSC contract, without legal justification. The alternative to GC0106 was rejected by Ofgem in their decision letter on this as it was based on an erroneous legal interpretation.</p> <p>We believe this issue is more appropriately addressed through Grid Code modification proposal GC0117 (Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements) where the full costs and implications of any change can be assessed, and in which changes not specifically required to comply with European legislation can be introduced.</p> <p>We also have concerns that if this alternative were to proceed, it would interact with the Open Networks work (as identified through GC0117) but more importantly risk delaying implementation of the European Emergency and Restoration Code into the GB Grid Code to the extent that the timeframes as stipulated by the European Commission could not be met causing non-compliance and licence breach.</p> <p>We believe the alternative is based on an incorrect legal interpretation and is not backed up by a legal opinion. We do not believe that the alternative can be considered to be better than the baseline or proposal.</p> |

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| Respondent: | <i>Robert Selbie</i> |
| Company Name: | <i>ElecLink Limited</i> |
| Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries) | <i>To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i> <i>(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);</i> <i>(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;</i> <i>(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 Commission and/or the Agency; and</i> <i>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i> |

Standard Workgroup consultation questions

| Q | Question | Response |
|---|---|----------|
| 1 | Do you believe that GC0127 and GC0128 Original proposal, better facilitates the Grid Code Objectives? | Yes |
| 2 | Do you support the proposed implementation approach? | Yes |

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| 3 | <p>Do you have any other comments?</p> | <p>As previously highlighted in response to the System Defence Plan (SDP) and System Restoration Plan (SRP) consultations, ElecLink's primary concern is the lack of clarity around the definition of TSO, and the responsibilities that fall onto interconnector TSOs from the SDP and SRP.</p> <p>In GB the assignment of responsibilities placed on TSOs through the NCER is completed by Ofgem. The Ofgem minded-to decision on the assignment of responsibilities describes the requirements per TSO type, specifically noting where obligations are to be placed to ensure GB compliance on the categories of TSO: SO, TO, I/C and OFTO.</p> <p>This clarity is unfortunately not reflected in the E&R SDP and SRP documentation, particularly the System Defence Plan where different terminology is used.</p> <p>When considering the alignment of the Grid Code with the EU network code for Emergency and Restoration (NCER), GC0127 and GC0128 should clarify the requirements for interconnector TSOs.</p> <p><u>System Defence Plan</u></p> <p>Within the SDP, interconnector TSOs are referred to as HVDC Interconnectors, however where a requirement is on 'All TSOs' it is not clear whether this refers to 'onshore TSOs' or all GB TSOs, including interconnectors TSOs and OFTOs.</p> <p>ElecLink require clarity on this in the System Defence Plan, in order to understand what is required of ElecLink and other interconnectors as certified Transmission System Operators.</p> <p>If the 'All TSOs' obligations in the System Defence Plan apply to ElecLink, we would like to highlight the following points.</p> <p>Paragraph 5.2 of the SDP states that the requirement for critical tools and facilities to be available for 24 hours in case of a local loss of external power is a requirement for the NETSO, onshore TSOs and DSOs. It is unclear whether this is in conflict with the assignment of responsibilities by Ofgem in their minded to decision where this obligation is on all types of TSO. Clarity would be welcomed on this point, as the provision of these communication facilities for interconnector TSOs requires further consideration, including any potential cost recovery arrangements.</p> <p>In the case that these obligations apply to interconnector TSOs we would require further detail on exactly which tools and facilities are covered by SO GL article 24, specific to ElecLink (that is, the precise selection of tools and facilities based on the specific arrangements being put in place between NGESO, ElecLink and RTE).</p> <p>Section 7 of the SDP describes compliance and assurance testing which places requirements on 'Each TSO'.</p> <p>In the case that some or all of these obligations do not apply to interconnector TSOs, we would request that this is made clear in the System Defence Plan.</p> <p>In the case that some or all of these obligations do apply to interconnector TSOs, we would request that this is made clear in the Grid Code. In addition in the case that these are required by ElecLink and other interconnector TSOs, we would request that these provisions are included in the trilateral (including connecting TSOs in other countries) and bilateral arrangements are reflected to include these. Given the differing requirements of the connecting TSO, we would also request that these provisions are considered on a case by case basis and reflect the arrangements in place for each TSO.</p> <p><u>Significant Grid Users</u></p> <p>Page 15 of the Workgroup consultation report highlights workgroup member concerns regarding the lack of clarity surrounding who is and isn't an SGU in GB. ElecLink would like</p> |
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| Q | Question | Response |
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| | | <p>to echo these concerns and welcomes the efforts made by the workgroup to provide greater clarity.</p> <p>ElecLink requests for further clarification for the case that an interconnector TSO is also an SGU. Do the requirements of an SGU also apply, or is it intended to refer to non-TSO HVDC systems for the purposes of connected generation.</p> <p>System Restoration Plan</p> <p>Section 2.1 of the SRP describes the process that will take place to enact the restoration plan. It states that the procedures will be activated by the NETSO in coordination with DSOs, SGUs and Restoration Service Providers, as well as stating that the NETSO will coordinate impacted TSOs where these procedures have a significant cross border impact.</p> <p>In the case that an interconnector is not an RSP, we believe that our function as the link between NGESO and the cross-border market means that interconnectors should be explicitly informed on the change of system state, particularly where a market action (halting allocation, for example) is required. GC0127 and GC0128 should clarify the role of interconnector TSOs in this coordination.</p> |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No |

Specific questions for GC0127 & 128

| Q | Question | Response |
|---|---|--|
| 5 | Do you think the wording in OC9.2.5 could be improved, if so what do you suggest? Please note that the legal text can be located in Annex 4. | No suggestions. |
| 6 | A Workgroup member has an alternate interpretation of what of a SGU, SRP, SDP is as part of the modification and is considering raising an alternative solution; what are your views on this? | ElecLink believes NGESO is well placed to determine who is and who isn't an SGU but ElecLink believes NGESO should explicitly notify all SGUs so that parties are aware of their responsibilities. |

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| Respondent: | <i>Alan Creighton</i> |
| Company Name: | <i>Northern Powergrid</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</i> <i>(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);</i> <i>(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;</i> <i>(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 Commission and/or the Agency; and</i> <i>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i> |

Standard Workgroup consultation questions

| Q | Question | Response |
|---|--|---|
| 1 | Do you believe that GC0127 and GC0128 Original proposal, better facilitates the Grid Code Objectives? | Yes |
| 2 | Do you support the proposed implementation approach? | Yes |
| 3 | Do you have any other comments? | <p>Detailed comments are embedded in the attached version of the consultation document, however we specifically want to draw out concerns about LFDD testing and E & R Code Mapping:</p> <p>LFDD testing.</p> <p>We have concerns about setting a requirement for testing LFDD relays at least once every three years. Following a review of protection maintenance, based on Failure Modes Effects and Critical Analysis (FMECA) and Reliability Centred Maintenance (RCM) principles, the protection maintenance intervals for relevant Northern Powergrid protection relays, which include LFDD relays, was set at a basic frequency of three years but with flexibility to extend this period to allow for efficient maintenance planning, outage planning, co-ordination with work on the same and adjacent circuits etc, provided that there are safeguards.</p> <p>We are of the view that requiring maintenance to be carried out at least every three years will increase operational costs and expose customers to additional risks, for example if planned outages need to be taken to test LFDD relays out of sequence with other protection relays on the same circuit, and are concerned that the Workgroup has not presented any evidence in the report as to why they consider an absolute three year period to be required.</p> <p>The Workgroup should base the required maintenance period on existing best practice; we have suggested three / five years in the text below as it generally aligns with Northern Powergrid practice, although feedback should be sought from other network operators.</p> <p>In addition, although LFDD relays are typically installed at all the relevant sites to allow for flexibility in setting up the overall LFDD scheme, not all relays are actually</p> |

| Q | Question | Response |
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| | | <p>used to deliver LFDD scheme functionality. We think that the requirements should only apply to LFDD relays in service; this aligns with the requirement in E&R which refers to relays that are ‘implemented’ rather than ‘installed’.</p> <p>It is also worth noting that NGET own some LFDD relays in our region, and these should be subject to the same testing regime.</p> <p>We propose that the Grid Code obligation in this regard is revised to be either:</p> <p>C.C.A5.4.2 Each Network Operator and the Relevant Transmission Licensee shall execute testing on its low frequency demand disconnection relays installed within its network and in service at least once every five years.</p> <p>This would allow the NO / RTL to have a protection policy that would have a basic requirement of a period less than five years, and also permit flexibility for efficient protection maintenance planning. This proposed text also applies the testing requirement for those LFDD relays that are in service.</p> <p>Or</p> <p>C.C.A5.4.2 Each Network Operator and the Relevant Transmission Licensee shall aim to execute testing on its low frequency demand disconnection relays installed within its network and in service at least once every three years, although this may be extended to no more than once every five years if considered to be required for operational purposes.</p> <p>This would allow the NO / RTL to have a protection policy that would have a basic requirement of three years, but again permit flexibility for efficient protection maintenance planning. This proposed text also applies the testing requirement for those LFDD relays that are in service.</p> <p>Or</p> <p>C.C.A5.4.2 Each Network Operator and the Relevant Transmission Licensee shall execute testing on its low frequency demand disconnection relays installed within</p> |

| Q | Question | Response |
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| | | <p>its network and in service at an interval agreed bilaterally with NGESO.</p> <p>This would allow the NO / RTL to present evidence to justify its own protection maintenance policy, based for example on its experience of the relays deployed on its network.</p> <p>E&R mapping</p> <p>It is important for the Workgroup to demonstrate that all the E&R Articles that need to be complied with and implemented by December 2019 are addressed by GC0127 or GC0128. We note that the title of the modification relates to aligning the Grid Code with the System Defence Plan and System Restoration Plan whereas the objective should be to align with the NC E&R.</p> |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No |

Specific questions for GC0127 & 128

| Q | Question | Response |
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| 5 | Do you think the wording in OC9.2.5 could be improved, if so what do you suggest? Please note that the legal text can be located in Annex 4. | As drafted OC9.2.9 just sets out what the scope of OC9 is and it doesn't place any obligations on any party to provide any information. If the intention is to place an obligation on a party to provide specified information, that obligation should be clearly set out in the Grid Code. Some of the new information included in OC9.2.9 e.g. 'Embedded Power Station data where such data is not visible to the Network Operator' and 'Status information' could be difficult and costly to provide; any such new obligation would need to be consulted upon properly. |

| Q | Question | Response |
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| 6 | <p>A Workgroup member has an alternate interpretation of what of a SGU, SRP, SDP is as part of the modification and is considering raising an alternative solution; what are your views on this?</p> | <p>Assuming that this relates to the definition / scope of a SGU, System Defence Provider and System Restoration Provider, we are content to be guided by the legal advice that NGESO receive on this subject.</p> <p>We note that although the terms GB SGU, Defence Service Provider and Restoration Service Provider are included in the System Defence Plan and System Restoration Plan, there is currently no proposal to include these definitions into the Grid Code. We agree that, as the System Defence Plan and System Restoration Plan do not place any obligations on any party (as all relevant obligations are in the Grid Code), this approach seems sensible.</p> |

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| Respondent: | <i>Paul Crolla</i> <i>M: +44 7541 977 109</i> <i>pcrolla@scottishpower.com</i> |
| Company Name: | <i>ScottishPower Renewables</i> |
| 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 GC0127 and GC0128 Original proposal, better facilitates the Grid Code Objectives? | Yes |
| 2 | Do you support the proposed implementation approach? | Yes This provides an efficient and good value to the consumer approach to implementation of the code |
| 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 GC0127 & 128

| Q | Question | Response |
|---|---|--|
| 5 | Do you think the wording in OC9.2.5 could be improved, if so what do you suggest? Please note that the legal text can be located in Annex 4. | Although SPR have previously questioned the position of the information sharing requirements, at this time we do not have a counter proposal and have no further comments on this. |
| 6 | A Workgroup member has an alternate interpretation of what of a SGU, SRP, SDP is as part of the modification and is considering raising an alternative solution; what are your views on this? | SPR think it is clear that only those with contracts with National Grid ESO are part of the SGU definition. |

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| Respondent: | Graeme Vincent graeme.vincent@spenergynetworks.co.uk |
| Company Name: | SP Energy Networks |
| 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> |

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| 1 | Do you believe that GC0127 and GC0128 Original proposal, better facilitates the Grid Code Objectives? | Yes |
| 2 | Do you support the proposed implementation approach? | Yes |
| 3 | Do you have any other comments? | <p>Whilst we recognise that the working group has addressed the modification aligning the Grid Code to the requirements of the System Defence and System Restoration Plan, we do think that it would have been more appropriate to align the Grid Code to the requirements arising from Emergency and Restoration NC as it is not clear that the SDP and SRP reflect fully the NC ER requirements.</p> <p>It is also important to acknowledge that the proposals for LFDD testing will give rise to additional costs and risks to Network Operators. It is acknowledged that the frequency of the testing requirements aligns with the Black Start tests for Generators, however, we believe that further assessment of the risks/costs which may be introduced from an increased testing regime across a wider asset base should be considered given the step change in volumes associated with this testing.</p> <p>Further comments are provided in the attached change marked version of the consultation</p> |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No |

Specific questions for GC0127 & 128

| Q | Question | Response |
|---|--|---|
| 5 | Do you think the wording in OC9.2.5 could be improved, if so what do you suggest? Please note that the legal text can be located in Annex 4. | <p><i>OC9.2.5 as drafted extends the scope of OC9 but does not specifically make any obligation on any party to provide the information.</i></p> <p><i>If the intention is to require Users to provide the information listed then the obligation to do this should be clearly defined within the Code.</i></p> |

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| 6 | A Workgroup member has an alternate interpretation of what of a SGU, SRP, SDP is as part of the modification and is considering raising an alternative solution; what are your views on this? | <p>Whilst we acknowledge that differing interpretations are possible we believe based on NGESO having sought appropriate legal guidance on the interpretation that the position taken is appropriate.</p> <p>It is noted that SGU is not proposed for inclusion within the Grid code and that this term will be within the SDP and the SRP, as such additional clarity that this applies only to parties which have a CUSC or other NGESO agreement should be made clearer within the drafting.</p> |

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| Respondent: | |
| Company Name: | <i>Drax Generation Enerprise Ltd</i> |
| Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries) | <p><i>(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i></p> <p><i>(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);</i></p> <p><i>(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;</i></p> <p><i>(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 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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| 1 | Do you believe that GC0127 and GC0128 Original proposal, better facilitates the Grid Code Objectives? | Yes |
| 2 | Do you support the proposed implementation approach? | Yes |

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| 3 | Do you have any other comments? | <p>Report Section 3</p> <p>In section 3 in the Storage Providers section it states that “Under the proposed System Defence Plan, NGESO define the cycle time from import to export to be set to a very low value (e.g. 1µs) so the default option will be for the storage plant to trip under low frequency.” and then uses the very small value of 1µs as a reason the Energy Storage cannot change from Import to Export quickly. There does not appear to be any reason given as why this 1µs value has been chosen which appears to be extremely small and given that rapid fault clearance is considered highly important, but only requires timescales in the order of 140ms, it remains a puzzle as to why the 1µs has been used. Given that the NCER requires Energy Storage transition from import to export provided it is quick enough, is it acceptable for GB to set a very small unrealistic transition time of 1µs and then decide that the transition requirements are not going to apply?</p> <p>OC5.7.1</p> <p>The proposed change to the OC5.7.1(a) legal text to add the new “quick re-synchronisation” test is in a section which modification GC0125 is in the process of changing and the proposed text does not fit well within the proposed new structure. It would possibly fit better adding the following sections to the proposed structure:-</p> <p>OC5.7.1(a) (iii) In the case of a Generator, The Company may also require a Generator with a Black Start Station to carry out a test (a “Quick Resynchronisation Unit Test”) in order to demonstrate that a Black Start Station has a Quick Re-synchronisation Capability.</p> <p>OC5.7.1(b) (iv) The Company may occasionally require the Generator to carry out a Quick Re-synchronisation Test at any time, but will generally only be required where the Generator has made a change to its Plant and Apparatus which has an impact on its Houseload Operation or after two unsuccessful tripping Events in the operational environment</p> |
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| Q | Question | Response |
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| | | <p>OC5.7.4 Quick Re-synchronisation Test</p> <ul style="list-style-type: none"> (a) The relevant Generating Unit shall be Synchronised and Loaded; (b) All the Auxiliary Gas Turbines and/or Auxiliary Diesel Engines in the Black Start Station in which that Generating Unit is situated, shall be Shutdown. (c) The Generating Unit shall tripped to house load. (d) The relevant Generating Unit shall be Synchronised to the System but not Loaded, unless the appropriate instruction has been given by The Company under BC2 which would also be in accordance with the requirements of the Black Start Contract. <p>In respect of EU Generators, the above tests defined in OC5.7.2.3(a) – (e) shall be in accordance with the requirements of ECC.6.3.5.6.</p> <p>There also needs the addition of some more definition such as Quick Re-synchronisation Test and subsequent sections need renumbered. Only question is this actually a Black Start service?</p> <p>OC5.5.3.3</p> <p>It is not clear with is whether the User is being expected to make judgements on NETS, and how they can do this. Is it not already covered within OC7.5 and more specifically in OC7.5.8, so is this change actually needed and is it in the correct location.</p> |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No |

Specific questions for GC0127 & 128

| Q | Question | Response |
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| 5 | Do you think the wording in OC9.2.5 could be improved, if so what do you suggest? Please note that the legal text can be located in Annex 4. | The proposed wording in OC9.2.5 is vague and it is not clear what it is trying to do? Nor is it clear who it is aimed at and expected to provide data? And finally what data is actually being requested? |
| 6 | A Workgroup member has an alternate interpretation of what of a SGU, SRP, SDP is as part of the modification and is considering raising an alternative solution; what are your views on this? | Given that is relates to a System Defence Plan are all generators not required to carryout actions to protect the system should a problem occur. |