

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:	Garth Graham (garth.graham@sse.com)
Company Name:	SSE Generation 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?	In our view GC0125 fails to better achieve Applicable Objective (d) as it fails to fully implement all the legal requirements set out in ERNC.
2	Do you support the proposed implementation approach?	The proposed implementation approach is not clear – is it ten Working Days after an Authority decision (like similar Grid Code Modifications) or some other date? Given this we cannot at this stage support an unknown implementation approach.
3	Do you have any other comments?	Noting the discussion on page 13 of the consultation, we are concerned that NGESO appears to want to contract for Black Start and other related Restoration services in a way that does not apply the Article 4(2)(b) terms and conditions for Restoration Service Providers that is required by the ERNC. We remind NGESO that they need to fully comply with the requirements within ERNC that apply to them (noting, for example, that to date they have failed to meet some of those requirements by the deadlines set out within ERNC).
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	<p>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.</p>	<p>It is not clear to us how interconnectors will be involved in the Local Joint Restoration Plans. We are concerned that contracted Black Start interconnector providers maybe treated differently to Black Start Generation providers in terms of the services, such as block loading, they are required within the LJRPs to achieve which could be detrimental to the restoration of electricity supplies in GB in the event of a Black Start event.</p>
6	<p>Do you have any comments on the proposed legal text in Annex 4 of the consultation?</p>	<p>For the reasons we note under Q3 above, the legal text for ‘Black Start Contract’ is deficient as it fails to reflect the legal requirement that the TSO is unable to contract for Restoration service provision except via the terms and conditions required by Article 4(2)(b) of ERNC approved by the NRA.</p> <p>We are concerned that it the TSO contracts for Restoration services on terms and conditions that are not those set out in accordance with Article 4(2)(b) of ERNC that those contracts will be (i) incompatible with the legal requirements of ERNC and (ii) therefore will be detrimental to the restoration of electricity supplies in GB in the event of a Black Start event.</p>