

CUSC/Grid Code Code Administrator Consultation Response Proforma**GC0142: Adding Non-standard voltages into the Grid Code**

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 to grid.code@nationalgrideso.com by **5pm on 14 August 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Panel.

If you have any queries on the content of this consultation please contact the Code Administrator grid.code@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Paul Crolla
Company name:	ScottishPower Renewables
Email address:	pcrolla@scottishpower.com
Phone number:	07541977109

For reference the applicable Grid Code objectives are:

Relevant Objective
(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 (a) and (b), 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 Commission and/or the Agency; and
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Grid Code/ Applicable CUSC Objectives?	<p>We believe this proposal overall better facilitates the Grid Code objectives by codifying traditionally non-standard voltages and providing for the use of a wider range of voltage equipment within the system.</p> <p>(a) Mostly positive, but could lead to inefficiencies if too many voltage levels are used as it could reduce cost efficiencies from standardisation.</p> <p>(b) Improves competition of equipment supply</p> <p>(c) Improved slightly</p> <p>(d) No change</p> <p>(e) Improved slightly</p>
2	Do you support the proposed implementation approach?	<p>Yes although SPR would like to highlight that NGENO need to clarify if these non standard voltages will be included eventually into TGN(E) 288 'Limits for Temporary Overvoltages in England and Wales'. SPR is concerned that if the non-standard voltages are included in TGN(E) 288, projects cost will increase as it could be the case for offshore windfarm connecting through an HVDC link or any other project where TGN (E) applies.</p>
3	Do you have any other comments?	<p>Please see comments on legal text attached</p> <p>It is our opinion that some further consideration should be given to defining ranges as many of the requirements change at 132 kV, but voltage variation ranges (for example) are given as 110kV-300kV, it would seem more sensible to consider <132kV, 132kV-300kV, and >300kV as the applicable voltage ranges for requirements.</p>