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Dear Trisha,

Grid Code Modification Proposal GC0151 'Grid Code compliance with Fault Ride Through Requirements' – decision on Urgency

GC0151 was raised by SSE plc on 23 June 2021.¹ Following the Grid Code Review Panel meeting on 24 June 2021, we received a request from the Panel Chair on 25 June 2021 that GC0151 be treated as an Urgent Modification Proposal.²

This letter sets out our decision that Modification Proposal GC0151 should be progressed on an urgent basis.

Background

On 06 May 2021 National Grid Electricity System Operator (NGESO) wrote an open letter to the stakeholders regarding Grid Code compliance with Fault Ride Through requirements³. NGESO noted that over the few months running up to the letter they have experienced a growing number of instances where Generator or Network Operators' assets have apparently failed to ride through faults on the National Electricity Transmission System (NETS). NGESO further noted that these faults, which were deemed as normal or routine,

¹ [GC0151: Grid Code Compliance with Fault Ride Through Requirements | National Grid ESO](#)

² References to the "Authority", "Ofgem", "we", and "our" are used interchangeable in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

³ <https://www.nationalgrideso.com/news/open-letter-transmission-connected-generation>

were well within the design standards and requirements of the Grid Code and the System Operator Transmission Operator Code (STC), and the apparent inability of NETS Users to ride through these normal faults presented a serious risk to the System. NGESO highlighted the need to manage this quickly and effectively, reminding industry of the obligations on the Users and Network Operators to ensure compliance with the Grid Code and STC at all times.

While seeking to address the situation NGESO set out three actions in their letter that all Users and Network Operators should follow. NGESO sought confirmation from the Users that they are compliant with all aspects of the Grid Code or STC, and in particular the Fault Ride Through capability. Further noting the serious nature and consequences of this issue, the NGESO took action to bring in Code modifications to provide clarity on what happens soon after any apparent non-compliances are observed. To manage the operational risks that non-compliant Users present to the NETS, NGESO set out an interim process to be followed whilst full Code modifications are developed. These actions were deemed necessary to maintain the security of supply.

GC0151 Overview and request for Urgency

In GC0151, the Proposer has noted their concerns with the interim measures and has proposed a process for incorporating in the Grid Code to be followed in case of a User or Network Operator asset trip or de-load coincident with a transmission system fault. The proposer requested that the Panel treat this modification as urgent. In support of their request, the Proposer submitted that if not urgently addressed this will cause:

- A significant commercial impact on Users, Network Operators, Suppliers, other market participants and consumers or other stakeholder(s); and
- A significant impact on the safety and security of the electricity system; and
- Users to be at risk of being deemed to have breached relevant legal requirements (REMIT Article 5) in the event that they were to voluntarily reduce their export limit.

Panel View

At the Grid Code Review Panel meeting on 24 June 2021, the Panel voted by majority (9 out of 10) in favour of the motion and agreed to recommend to Ofgem that GC0151 should be progressed as an Urgent Modification Proposal.

Whilst the majority of the Panel accepted the Proposal for urgency the Panel noted that the ESO's letter had created an issue for industry; that needed to be addressed on an urgent basis.

However one Panel member voted against. They stated that:

- Regardless of Urgency being approved a similar outcome would be achieved either way.
- The timetable being proposed is too ambitious and that issues within the letter could be best addressed via other means.

The Panel has set out an urgent timetable for the Proposal in an annex to their letter.

Our Views

In reaching our decision on the urgency of the Modification Proposal we have considered the details within the Proposal, the justification for urgency, the views of the Panel and we have also assessed the request against the urgency criteria set out in Ofgem's published guidance.⁴

Our guidance sets out that an urgent modification should be linked to an imminent issue or a current issue that if not urgently addressed, may cause:

- a significant commercial impact on parties, consumers or other stakeholder(s); or
- a significant impact on the safety and security of the electricity and/or gas systems; or
- a party to be in breach of any relevant legal requirements.

We appreciate the system security situation that led the NGESO to write an open letter on 6 May 2021 to the industry. We also understand the concerns that has led to the Proposer to request Urgency. We have considered these while assessing whether to grant GC0151 an Urgent status. We agree that the nature of the Proposal meets the Urgency criteria given the potential system security issues outlined by the NGESO in their open letter. NGESO has noted the growing incidents of apparent Fault Ride Through failures. NGESO has highlighted that the inability of NETS Users to ride through transmission system faults presents a serious system risk which needs to be managed quickly and has put in place interim measures. We agree an enduring solution is needed as soon as possible and therefore this Proposal warrants urgent consideration and should follow the urgent timetable as set out below.

We note the overlap in proposed date for start of Workgroups and our decision date in the Panel's letter to us. We have corrected that in table below.

⁴ <https://www.ofgem.gov.uk/publications-and-updates/ofgem-guidance-code-modification-urgency-criteria-0>

Process	Date
Ofgem Decision on Urgency	2 July 2021
Workgroups begin	5 July 2021
Workgroup report to Panel	6 September 2021
Code Administrator Consultation Commences	9 September 2021
Consultation Close-out for representations	23 September 2021
Final Modification Report available for Panel	5 October 2021
Modification Panel recommendation to Ofgem	7 October 2021
Ofgem Decision expected by	TBC

For the avoidance of doubt, in granting the request for Urgency, we have made no assessment of the merits of the Proposal and nothing in this letter in any way fetters our discretion in respect of the Proposal.

Yours sincerely,

Martin Queen
Principal Engineer – Analytics and Assurance