

Code Administrator Consultation Response Proforma**GC0151: Grid Code Compliance with Fault Ride Through Requirements**

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 27 September 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Nisar Ahmed nisar.ahmed@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Graeme Vincent
Company name:	SP Energy Networks
Email address:	graeme.vincent@spenergynetworks.co.uk
Phone number:	Click or tap here to enter text.

I wish my response to be:
(Please mark the relevant box)

Non-Confidential Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable Grid Code Objectives are:

- 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 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 Code Administrator Consultation questions		
1	Do you believe that the GC0151 Original Proposal or WAGCM1, WAGCM2, WAGCM3, WAGCM4, better facilitates the Applicable Objectives?	<p>WAGCM1 is preferable to the Original as it avoids the arbitrary inclusion of network operators into the proposed wording of OC5.4.2 which adds confusion and complexity to the Grid Code as FRT requirements (under CC.6.3.15 or ECC 6.3.15) do not apply to Network Operators. It also avoids the introduction of new processes and terminology concepts (e.g. export limitation, export capability) to parties which these terms are not relevant or applicable to. The introduction of these would be both inefficient and uncoordinated as a further modification would be required to address the deficiencies created.</p> <p>WAGCM2 on its own clarifies existing fault ride text and doesn't itself seek to address the 'process' issue.</p> <p>As WAGCM3 combines the legal text changes with those contained within the Original, our comments relating to the original equally apply to this proposal.</p> <p>WAGCM4 which combines the legal text for WAGCMs 1 & 2 have their merits in that they also attempt to provide clarity to the existing Grid Code requirements though perhaps could benefit from wider consultation given the limited opportunity stakeholders have had to review and consider them.</p>
2	Do you support the proposed implementation approach?	<p>Yes but not for the Original or WAGCM3 as further work would be required to fully define/clarify the applicability of the proposed processes to all parties (and in particular network operators) and to definitions to ensure that there is no ambiguity to parties on their obligations under this proposal.</p> <p>Additional time for stakeholders to fully consider the proposals in WAGCMs 2-4 would be beneficial before the implementation of any proposals contained within these modifications was undertaken.</p>
3	Do you have any other comments?	No.