

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
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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>The security of the system is of great importance to EDF, and, in principle, we support the proposals to address Fault Ride Through non-compliance risk.</p> <p>However, we are of the view that the current versions of the proposal and alternatives leave unnecessary risk as set out below.</p> <p>We <u>do not</u> believe that the GC0151 Original or any of the WAGCM's better facilitates Grid Code Objectives (ii) & (iii).</p> <p>The Original Proposal and the WAGCM's would all create an additional risk to the security and efficiency of the system from an incorrect instruction to a generator to restrict output following an FRT incident. This detracts from Objective (iii). See Response to Q2 below.</p> <p>The Original Proposal 100MW threshold for restricted output would still leave the system at risk if there was no engagement to assess FRT compliance by the generator. This does not meet Objective (iii)</p> <p>The 70% restricted output limit in the Original Proposal is discriminatory because some existing generators would not be able to maintain a 70% limit all of the time. This does not meet Objective (ii)</p> <p>The absence of a requirement for the ESO to carry out an appropriate assessment following an event, before instructing a generator to restrict output, leaves too much judgement with the ESO to decide on FRT compliance, with no review or appeal. The process to be used and decisions by ESO are not clear and challengeable. The commercial consequences on a generator from an incorrect requirement to restrict output would be significant. This does not meet Objective (ii). See Response to Q2 below.</p>
2	Do you support the proposed implementation approach?	We are supportive of an approach to modify the Grid Code to decrease FRT non-compliance risk to the system. However, the present form of the GC0151 Original proposal and all of WAGCM's

		<p>leaves too much judgement with the ESO to decide on de-load actions following FRT events, with potentially insufficient time and evidence to make a correct decision.</p> <p>In these proposals, there is no requirement for the ESO to have carried out an appropriate assessment of the FRT event or to have confirmed that relevant information, such as voltage traces, had been reviewed before instructing a generator to restrict output.</p> <p>This would be a very significant decision by the ESO, which could have security of supply and operability implications for the system from removal of generation, and severe commercial implications for the generator.</p> <p>In these proposals there is no route to appeal the ESO's decision or any route to compensate a generator that has been incorrectly instructed to restrict output.</p> <p>There is recent experience of the risks that would arise from these proposed modifications from an incident at a Transmission Owned 400kV substation. Voltage traces from the TO were not made available to an affected generator until 5 days after the incident.</p> <p>The future risk with these GC0151 proposals in the current form is that, following such an incident, a generator could incorrectly be required to restrict output for a significant period of time.</p>
3	Do you have any other comments?	We believe that Ofgem should confirm the legal position concerning REMIT, raised by the Original Proposal. Confirmation is required that a Grid Code modification would mean that the normal approach to MEL is overridden and that a generator would be compliant with REMIT following an OC5 instruction to restrict output.