

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:	Simon Lord
Company name:	Engie
Email address:	Simon.lord@engie.com
Phone number:	07980-793692

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	<p>Do you believe that the GC0151 Original Proposal or WAGCM1, WAGCM2, WAGCM3, WAGCM4, better facilitates the Applicable Objectives?</p>	<p>We think that the Original and WACM1 are better than base line with WACM1 being best is best. The other WACMS are not better than baseline.</p> <p>Detail</p> <p>The workgroup has not completed its deliberations on the technical details of WACM 2-4, as such these alternatives may not be suitable for the code. Whilst we acknowledged some of the issues have merit a detailed review has not taken place by the working group as only limited time was available to review the proposal. As such WACM 2-4 do not improve the baseline. These should be raised as separate modification following the none-urgent process.</p> <p>The key issues associated with WACM1, and the original are set out below and this guides our views as to the solution.</p> <ol style="list-style-type: none"> 1) The interaction between OC5.4.2.2 and OC10. The process detailed in OC10.4.1.4 (below) is assumed to take precedence and this is how a user expects to respond to a notice so after 2 hours a user can submit a preliminary report that can be followed up as soon as is reasonably practical with a full written report (engineering) . With agreement with ESO we can delay the primary report beyond the 2 hours. 2) Once a user is notified of a possible issue any restriction the ESO may wish to impose needs to be agreed with the User if there is no agreement then the user can continue to operate as normal and there is no obligation on the user to agree as it continues to investigate the issue prior to submit its written report. 3) The main differentiator between Original and WACM1 s the automation restrictions that apply during the investigation. We believe that any restrictions should not be automatic and should be agreed between the user and the ESO

		Both the original and WACM 1 are better than baseline, but we prefer WACM1 as it is more flexible and less prescriptive in terms of load level following an event that the original.
2	Do you support the proposed implementation approach?	Yes we do
3	Do you have any other comments?	<p>Yes</p> <p>The inertia light system driven by increased use of lower carbon plant leads the transmission system being much more sensitive to the loss of generation than it has been in the past. Whilst there has always been fault ride through obligations on generation the ESO via its open letter has indicated it wishes generation to re-look at its systems to ensure compliance.</p> <p>Fault ride through is a much more “important” requirement than it has historically been. The requirement is also impossible to test so it is typically achieved by ensure that the plant design and modifications take account of the requirement.</p> <p>During the development of the solution the ESO has helpfully engaged with working group and recognised the issue that generating plant faces and these have been taken account of in its alternative.</p> <p>The change to the code hopefully ensures that issue associated with fault ride through compliance are tackled by the generator community as and when they become apparat.</p> <p>Through this process we hope that the regulator and the ESO now recognise that applying an absolute requirement in this area is not a practical proposition and the solution of real time “testing” followed by reporting/flagging up by the ESO will deliver a better outcome for generators and customers.</p>