

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:	Alan Creighton
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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>We are of the view that WAGCM4 better facilitates the applicable Grid Code objectives because it combines WAGCM2, which clarifies the Fault Ride Through (FRT) requirements themselves, and WAGCM1, which provides flexibility for NGENSO to implement agreed operational constraints on equipment where its Fault Ride Through compliance is uncertain.</p> <p>Assessment against GCode objectives</p> <p>a) <i>To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity.</i></p> <p>Positive, as it recognises the importance of FRT and provides a mechanism for NGENSO to manage the system implications of potential FRT non-compliance.</p> <p>b) <i>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);</i></p> <p>Neutral.</p> <p>c) <i>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;</i></p> <p>Positive, as it recognises the importance of FRT and provides a mechanism for NGENSO to manage the system implications of</p>

		<p>potential FRT non-compliance.</p> <p><i>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;</i></p> <p>Neutral.</p> <p><i>e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p> <p>Neutral.</p>
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>We recognise that due to the urgent nature of the modification there was limited the time for discussion and debate particularly on the drafting of the legal text. We welcome the confirmation from NGESO that the changes have no implications for a DNO where they do not have any HVDC Equipment or DC Converters as an integral part their network. As this is the current position, we agree that proposed Grid Code legal text associated with the various options would implement the various solutions.</p> <p>However, if in the future a network operator does have HVDC Equipment or DC Converters as an integral part its network, it is our view that that the legal text proposed to implement the Original proposal would need to be revised because the concept of TEC, export capability, export limit etc. wouldn't have any meaning in the context of network operators equipment. The legal text proposed to implement WAGCM1 is more generic and would be easier to apply to network operator's equipment.</p>