

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:	Garth Graham
Company name:	SSE Generation
Email address:	Garth.graham@sse.com
Phone number:	01738 456000

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>As the proposer of GC0151 we believe that it better facilitates the Applicable Objectives for the reasons we detailed in our proposal form (which, for the sake of brevity, we refrain from repeating here).</p> <p>In respect of the WACMs all are better, when <u>compared to the Baseline</u> in respect of Applicable Objectives for the reasons we highlighted in our Original proposal (which likewise, for the sake of brevity, we refrain from repeating here).</p> <p>In particular we believe that the detailed clarifications provided by the Workgroup member from Drax to be both very helpful as well as being an improvement on the Original and therefore, in our view, WACM3 is BEST as it has all the benefits our Original proposal plus those helpful clarifications.</p>
2	Do you support the proposed implementation approach?	Yes, we support the proposed implementation approach.
3	Do you have any other comments?	<p>This proposal has attempted to resolve a substantial issue as raised by the ESO in an expeditious manner reflective of the urgency and importance of the needs for system security. When time permits it would be beneficial in our view to undertake a thorough in-depth review of this area.</p> <p>We note the view of the ESO; as expressed in the Workgroup meetings as well as in their Workgroup consultation response and in the Workgroup Report itself; concerning REMIT reporting.</p> <p>As we set out in the Original proposal (and which the ESO has not refuted) the financial penalty <u>if</u> a party is found to have withheld capacity is substantial. The ESO's view is that 'voluntarily' withholding is, in their view, OK.</p>

	<p>However, we do not share the somewhat '<i>laissez-faire</i>' view that the ESO suggest in this regard.</p> <p>Rather, we wish to ensure that any limitation to the output of a generator, or interconnector or network asset is based on sound reasoning and that a widely applied generic assumption of non-compliance with the Grid Code when <u>any</u> FRT event occurs (which is what the ESO was seeking to apply with its 7th May 2021 letter) is neither appropriate or legally compliant (with REMIT).</p> <p>Finally, it has come to our attention that the 'open letter' issued by the ESO was changed¹ subsequent to its 6th May 2021 publication² without the subsequent change being highlighted to stakeholders reading the later version. As a matter of course it would be better for the ESO to have issued a dated actual letter; i.e. a pdf version; and placed that on its website with any subsequent revision(s) also being dated (with the new date) so that stakeholders would be aware of the change in circumstances.</p>
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¹ The additional wording was: "*In writing the confirmation of compliance, the Users or network licensees should consider if any changes to plant and equipment that may have occurred since last compliance confirmation have affected any compliance aspects particularly fault ride through capability. Users are NOT expected to conduct any compliance tests or simulations studies to re-confirm any compliance aspects unless the User believes there is a reasonable ground to do so.*"

² <https://www.nationalgrideso.com/news/open-letter-transmission-connected-generation>