

Code Administrator Consultation Response Proforma**GC0138: Compliance process technical improvements (EU and GB User)**

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 03 December 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:	David Halford
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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 GC0138 Original Proposal better facilitates the Applicable Objectives?	<p>Yes, we believe that the Original Proposal better supports a, b and c of the Grid Code Objectives.</p> <p>The Original Proposal will achieve these objectives by ensuring the Compliance Processes, the European Compliance Processes and OC5 of the Grid Code are updated to detail test requirements including Fault Ride Through and Factory Acceptance testing, harmonise submission of test data, and clarify simulations.</p>
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>With the rapidly changing energy mix, and continued emergence of new technologies, it is vital that final site testing can be completed in the most efficient manner as possible when there is not an on-site presence by The ESO.</p> <p>We believe that this proposal will codify the changes required to deliver a robust approach to testing simulations, ensure testing requirements are visible and unambiguous, and give affected parties a high level of confidence that their technologies are compliant.</p>