

Workgroup Consultation Response Proforma

GC0141: Compliance Processes and Modelling amendments following 9th August Power Disruption

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 **30 March 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Joseph Henry Joseph.henry@nationalgrideso.com or grid.code@nationalgrideso.com

| Respondent details | Please enter your details |
|-------------------------|---------------------------|
| Respondent name: | Thomas Derry |
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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 regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

| Standard Workgroup Consultation questions | | |
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| 1 | Do you believe that the GC0141 Original | The proposal has a neutral impact across all the applicable objectives. |

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| | Proposal better facilitates the Applicable Objectives? | |
| 2 | Do you support the proposed implementation approach? | Yes |
| 3 | Do you have any other comments? | No |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | No |
| Modification Specific Workgroup Consultation questions | | |
| 5 | What should the Independent Engineer's deliverables be with respect to the outcome of the compliance process? | No comment |
| 6 | Should there be specific requirements on the retention of data for the User and/or the ESO? | No comment |
| 7 | Should the detailed design stage be more clearly identified within the Grid Code? | No comment |
| 8 | What stages of implementation would the industry believe are appropriate? | No comment |
| 9 | Should the ESO be required to undertake the responsibilities associated with an independent engineer? Please outline your rationale. | No comment |
| 10 | Should there be greater definition be given to "substantial modification" given that | It is unclear as to whether the independent engineer would be required to review all reports following a 'substantial modification'. It would be beneficial to further define what a substantial modification is, |

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| | the self-certification process places the onerous on the User to make these decisions? | especially if it is going to be subject to the independent engineer review process as this will add additional time and cost to the process. |
| 11 | Should there be a review of the effectiveness of GC0141 post implementation and after the industry has experience of implementing? | A post implementation review is a prudent suggestion but it is unclear how such a review would be carried out to determine the effectiveness of GC0141. This modification is suggesting that the proposed changes will help prevent another incident similar to what occurred on 9 th August 2019 so the question that will need to be answered is, has GC0141 prevented another incident similar to what occurred on 9 th August 2019. |
| 12 | What are your thoughts on the workgroup's discussions regarding compliance repeat plan? How would this work in regard to Independent Engineer Verification? | <p>The Compliance Repeat plan appears to be onerous for little benefit, Users are already required to reassess their compliance following 'substantial modification'.</p> <p>The independent engineer should not be required as part of the Compliance Repeat plan.</p> <p>The requirements of the new legal text in CP.8 require a DC Converter Station owner to submit every 5 years:</p> <ul style="list-style-type: none"> • A Compliance Statement; • A User Self Certification of Compliance; and • A complete set of Planning Code Data <p>The Compliance Statement is referred to in the Grid Code but there is not a standard template as to what this document contains. If this compliance process needs to be repeated every 5 years, a clear template for each type of user should be developed so that it is clear what is being asked for by NGENSO. This will help make the Compliance Repeat process easier to complete without having to determine if every clause in the Compliance Statement applies to us.</p> <p>It should be made clear that this is compliance with the Grid Code at the time of connection as determined by the Bilateral Connection Agreement. This should not be a complete reassessment against the Grid Code at the time of the Compliance Repeat.</p> |
| 13 | Do you believe that screening processes | No comment |

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| | should be applied ahead of detailed dynamic EMT simulation, and if so, do you believe data exchange should support that? | |
| 14 | Do you agree that the roles and responsibilities associated with interaction studies should be detailed and clarified, and to what extent? | No comment |
| 15 | Do you agree that improved definitions of the types of analysis and definitions suitable analysis environments ahead of the detailed design phase provides useful clarity and minimised project disruption in delivering the principles of this grid code change? Should these form part of legal text or made available with the modification as guidance that may be separately updated from time to time | No comment |
| 16 | Do you agree that clarifying roles and responsibility in the management of interaction studies assists more clearly defining the analysis needs of each party, minimising confusion, unnecessary overlap and cost in the design phase? | No comment |

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| 17 | Do you agree that small signal analysis supporting the screening of interaction cases should be clearly specified within this grid code change, to better focus the range of EMT studies being discussed, and within the context of existing SSTI and SSO analysis better inform assessment of risks and the need for detailed dynamic simulation which includes shaft data for SSTI? | No comment |
| 18 | What is your view on the separation of the simplified RMS model and EMT model when it comes to confidentiality, distribution and the protection of IP? | No comment |
| 19 | As it currently stands, what is your view on the process by which detailed manufacturer EMT-type models are exchanged for necessary studies as part of project delivery? | No comment |
| 20 | Are sections PCA.9.8 and PC.A.9.9 better suited to a guidance document and or should they be included, at least partly, within the legal text? Are there any specific concerns with respect to | This information is useful but may be difficult to keep up to date within the Grid Code if requirements ever change. It may be easier to refer to a guidance document, or require the establishment of a guidance document in the Grid Code, so the User is aware that it exists and then maintain a separate guidance document that can be more flexible. |

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| | requirements set out within those sections? | |
| 21 | In terms of the requirement for existing users to provide sub-synchronous torsional data for existing plant that may be provided, do you see any issues in regard to the provision of this data? | As there remains an obligation for sub-synchronous torsional studies to be completed, it is important that the data is available for these studies to be completed. BritNed cannot comment on how challenging it is for existing generation plant obtain this information. |
| 22 | Should responsibility for interoperability remain with the generator or the ESO, inclusive of interoperability studies such as control interactions and SSCI/SSTI studies? Please provide your reasoning. | No comment |