

## 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](mailto: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](mailto:Joseph.henry@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

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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		
1	Do you believe that the GC0141 Original	We believe it does though it does increase the costs and workload for Users

	Proposal better facilitates the Applicable Objectives?	
2	Do you support the proposed implementation approach?	<p>In part, there are options in the legal text:  PC.3.8 Preference to original proposal if the user can then share model when required whilst maintaining required confidentiality. The last option of the, shall we describe it as a 'model portal' may be even better but it is not clear if this is truly feasible, but it would simplify the workload and may ease the burden on newer generators.  PC.A.5.3.2 g prefer original text  CC 6.3.15 Although better than the base case 30 minutes could be seen as too long for the ESO to have taken action against the original trigger.</p>
3	Do you have any other comments?	<p>We have a concern that RMS models are being/going to be used for SSTI study. However, IEEE Std 421.5 (excitation models) states "These models would not normally be adequate for use in studies of shaft torsional interaction problems". It looks this has not been considered, though such models may be adequate for initial assessment.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Click or tap here to enter text.
<b>Modification Specific Workgroup Consultation questions</b>		
5	What should the Independent Engineer's deliverables be with respect to the outcome of the compliance process?	Click or tap here to enter text.
6	Should there be specific requirements on the retention of data for the User and/or the ESO?	<p>Historic data has been a stumbling block for parties in the past when investigations are required. Users should maintain suitable records and data retention, but I feel the ESO should be the reference in this respect and should keep each previous UDFS submission for future usage.</p>
7	Should the detailed design stage be more clearly identified within the Grid Code?	Click or tap here to enter text.

8	What stages of implementation would the industry believe are appropriate?	Click or tap here to enter text.
9	Should the ESO be required to undertake the responsibilities associated with an independent engineer? Please outline your rationale.	Although the ESO is not independent in this arrangement an 'in-house' option may be of value to newer generators who may lack knowledge of who or how to meet the requirements of the independent engineer. Could the TO perform such a role?
10	Should there be greater definition be given to "substantial modification" given that the self-certification process places the onerous on the User to make these decisions?	This is a question which dates back to the RfG implementation and we have always maintained that the existing definition provides little clarity as to what forms such a modification. Depending on Users view the ESO could receive excessive numbers of modification notifications or none at all. If the ESO, or Ofgem, have a view on what is substantial (in relation to physical plant and changes in the BCA) then this should be illustrated by examples either in the GC, or less preferable, in a guidance document. The illustration, of course, cannot be exhaustive but could steer users in the direction envisaged by the ESO and NRA, for example, the G99 illustrations of what classifies as a power generating module. What is a substantial change to a BCA, a change to TEC, a change to appendix F, etc?
11	Should there be a review of the effectiveness of GC0141 post implementation and after the industry has experience of implementing?	Most definitely, the process will add man hours and costs to Users so if it is not working then the ESO has the obligation to review as part of the requirement of operating the system in an efficient manner.
12	What are your thoughts on the workgroup's discussions regarding compliance repeat plan? How would this work in regard to Independent Engineer Verification?	Use of external consultants to undertake the function of independent engineer would add notable costs to the repeat plan and each outage undertaken where a LON is issued for all Users. Alternative internal options, either from the User or ESO, although likely to be less independent, may present a more financial efficient process assuming the costs from the ESO have some form of transparency and fixed level.
13	Do you believe that screening processes should be applied	Click or tap here to enter text.

	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?	This will depend on whether there is a consensus that the ESO should undertake interoperability studies, if there is not then some additional detail on who undertakes what may be beneficial.
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	Click or tap here to enter text.
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?	Click or tap here to enter text.
17	Do you agree that small signal analysis	Click or tap here to enter text.

	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?	
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?	We are in agreement over the change in confidentiality arrangements between RMS and EMT models, we have seen little or no complaint regarding RMS and IP from OEMs. We support the alternative proposal for EMT models, allowing encryption (PCA.9.9.2).
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?	This always seems to be a stumbling block as it can take a lot of time to obtain such models as manufacturers are under little incentive to cooperate quickly, though this does appear to be improving. Codifying the need for these models from the outset will enable automatic production and sharing. We feel there should be a degree of grandfathering for existing plant and projects where this data/requirement does not currently apply.
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 requirements set out within those sections?	They do feel excessively detailed for the Grid Code where normally the minimum requirement is laid out and guidance document maybe a better vehicle. However, the benefit of being in the Grid Code is the governance and the accessibility of all details being in one place

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?	This data is often not available and can be somewhat laborious to obtain but we understand why it is needed.
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.	If the ESO is in receipt of all the data to undertake such studies, it feels that they are best placed to undertake the interoperability studies and as a User we feel they will be inherently independent at assessing such studies.