

GCDF : Code Change Proposal for Small BEGA

Current Situation

- ECP.6 and ECP.7 refers to provisions in relation to the issue of an **Interim Operational Notification** and **Final Operational Notification** respectively for a Power Station consisting of Type C and Type D Power Generating Modules (PGM)
- **ECP.6** lists the items for submission prior to issue of the **Interim Operational Notification** which includes but not limited to,
 - Planning Code data
 - Simulation Models as per PC
 - Simulation Studies as per PC and CC/CP/ECC/ECP
 - Test Schedules as per ECP
- **ECP.7** lists the items for submission prior to issue of the **Final Operational Notification** which includes but not limited to,
 - Planning Code data
 - Test results compliant with relevant Grid Code sections (CP/ECP)
 - Controller Model Validation (PC)
- *When the requirements of **ECP.6** have been met, The Company will notify the Generator that the:*
 - Synchronous Power Generating Module,
 - CCGT Module,
 - Power Park Module
 - or Dynamically controlled OTSUA as applicable*may be Synchronised to the Total System **through the issue of an Interim Operational Notification***
- *If the requirements of **ECP.7** have been successfully met, The Company will notify the Generator that compliance with the relevant Grid Code provisions has been demonstrated for the Power Generating Module(s) **through the issue of a Final Operational Notification***

Problem Statement

- An Embedded Small Power Station may comprise of Type C or Type D Power Generating Modules. Embedded Small Power Stations are excluded from scope of Planning Code (PC.3.2(d)), Connection Conditions* (CC.3.1), European Connection Conditions* (ECC.3.1), Compliance Process (CP.3)
- An Embedded Small Power Station undergoes G99 compliance which, as per RfG shall be in scope of Distribution Network Operator. An Embedded Small Power Station may decide to have a Bilateral Agreement with ESO (Small BEGA) only to participate in Balancing Market
- In view of this, above text in Grid Code is misleading as it would prompt Type C/D PGMs in Embedded Small Power Stations to go through Grid Code compliance. This has raised concerns as Small BEGA customers cannot fulfil the requirements of ECP.6 and ECP.7, which may hinder them from receiving ESO Operational Notifications, and hence not be part of BM

*: Except when an Embedded Small Power Station decides to be a BM Participant, then relevant requirements of CC.6.5/ECC.6.5 apply

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Proposed Solution

- The purpose of ESO Interim/Final Operational Notification for Embedded Small Power Stations with Bilateral Agreement (Small BEGAs) is to be able to participate in BM Market. ESO shall not provide an Operational Notification to Small BEGAs as it falls in scope of relevant DNO.
- Therefore, it is proposed to change the definition of **Interim Operational Notification (ION)** to '**Interim - Balancing Notification**' (I-BN) and **Final Operational Notification (FON)** to '**Final - Balancing Notification**' (F-BN)
- Proposed Modifications:

Type C

- ❑ ECP.6.2.6: Add an extra text: For Embedded Small Power Stations, requirements of ECP.6.2.10 shall prevail.
- ❑ ECP.6.2.10 : In relation to Embedded Small Power Stations subject to Bilateral Agreement with The Company, Interim Operational Notification shall be replaced with '**Interim-Balancing Notification**', where following requirements apply: Prior to issuing '**Interim-Balancing Notification**', the Generator shall submit to The Company following documents to The Company's satisfaction
 - FON from relevant Network Operator (as applicable)
 - A copy of Power Generating Module Document signed off from the relevant Network Operator
 - Document(s) certifying fulfilment of ECC.6.5 requirements

Type D

- ❑ ECP.6.3.6: Add an extra text: For Embedded Small Power Stations, requirements of ECP.6.3.10 shall prevail.
- ❑ ECP.6.3.10 : In relation to Embedded Small Power Stations subject to Bilateral Agreement with The Company, Interim Operational Notification shall be replaced with '**Interim-Balancing Notification**', where following requirements apply: Prior to issuing '**Interim-Balancing Notification**', the Generator shall submit to The Company following documents to The Company's satisfaction
 - FON/ION from relevant Network Operator (as applicable)
 - A copy of Power Generating Module Document signed off from the relevant Network Operator
 - Document(s) certifying fulfilment of ECC.6.5 requirements
- ❑ ECP.7.6: : In relation to Embedded Small Power Stations subject to Bilateral Agreement with The Company, Final Operational Notification shall be replaced with '**Final-Balancing Notification**'. The Company may issue with '**Final-Balancing Notification**' provided the following requirements are fulfilled
 - The relevant Network Operator issues Final Operational Notification to the Embedded Generator
 - All the unresolved items (if any) on the Interim-Balancing Notification are fulfilled to The Company's satisfaction

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Potential Impact

- RfG mandates Relevant Network Operators (DNOs) to ensure Compliance in case of Embedded Power Stations. Therefore, the Compliance Responsibility for Small Embedded Power Stations should remain with Distribution Network Operator.
- As Grid Code excludes Small Embedded Power Stations from most of the scope, ESO shall request Distribution Network Operator to provide the proof of Compliance. This can be demonstrated using G99 Power Generating Module Document which lists all the Technical requirements along with method of demonstrating compliance
- ESO shall clarify the definition of Interim Operational Notification and Final Operational Notification for Small Embedded Customers so as to be consistent with rest of the Grid Code. This would help create transparency between ESO, Small Embedded Customers and DNOs
- ESO shall update the relevant Guidance Notes on website to reflect the change

[Note: This code change shall only affect Embedded Small Power Stations connected after April 2019 subject to implementation of RfG. All older small power stations were subject to requirements in G59 instead of G99]