

Code Administrator Consultation Response Proforma**CM085: To Clarify OFTO reactive power requirements at <20% output**

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 stcteam@nationalgrideso.com by **5pm on 25 October 2022**. 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 Sally Musaka Sally.musaka@nationalgrideso.com stcteam@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Richard Lamb
Company name:	National Grid Electricity Transmission
Email address:	Richard.Lamb@nationalgrid.com
Phone number:	Click or tap here to enter text.

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 STC Objectives are:

- a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act
- b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission
- c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity
- d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees
- e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.
- f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;
- g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

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 Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input checked="" type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input type="checkbox"/></td> </tr> <tr> <td></td> <td>E</td> <td><input type="checkbox"/>F</td> <td><input type="checkbox"/>G</td> <td></td> <td></td> </tr> </table> <p>NGET share responsibility for ensuring the onshore transmission network in England and Wales remains compliant with the requirements of the Grid Code and the Security and Quality of Supply Standards (SQSS).</p> <p>Whilst there is an increasing power transfer requirement during peak demands, there is a challenge to ensure the network remains compliant during the off-peak periods with lower demands across the network. The increasing volume of generation embedded within distribution networks, combined with the changing nature of these networks, has altered the reactive demand profile, resulting in higher voltages being seen on the transmission network during lightly loaded conditions.</p> <p>The challenges of ensuring the transmission network maintains compliance in the most economic and efficient manner is a responsibility that is shared amongst all licenced transmission parties. In this respect, assets that are end consumer-funded should be made available to avoid over-investment by a single licensee.</p> <p>The proposed changes to the STC will support Applicable STC Objectives a), b) and d).</p>	Original	<input checked="" type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input type="checkbox"/> C	<input checked="" type="checkbox"/> D	<input type="checkbox"/>		E	<input type="checkbox"/> F	<input type="checkbox"/> G		
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	E	<input type="checkbox"/> F	<input type="checkbox"/> G											
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>												
3	Do you have any other comments?	<p>We recognise that there may be a marginal increase in the operational costs for some OFTOs because of the proposed modification, however, this is significantly outweighed by the avoided investment costs that would be the alternative.</p> <p>We welcome the proposed clarification and fully support the changes to the STC. Whilst fully supportive of an expedient change to the code, we would also welcome</p>												

		clarity on the capability that would be unlocked by the proposals that can be relied upon by NGET in discharging its obligations under the SQSS.
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