

STC Modification Proposal Form

CM085: To clarify OFTO reactive power requirements at <20% output

Overview: It is unclear what the requirements are on OFTOs to provide access to reactive power capability at low windfarm outputs. This modification seeks to clarify that where reactive capability is available it should be provided which is operationally useful to the ESO

Modification process & timetable

Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.

This modification is expected to have a: Low impact

OFTOs and generators (specifically offshore windfarms)

**Proposer's
recommendation
of governance
route**

Standard Governance modification to proceed to Code Administrator Consultation

**Who can I talk to
about the change?****Proposer:**

Rob Wilson

Robert.wilson2@nationalgrideso.com

07799 656402

Code Administrator Contact:

Sally Musaka

Sally.musaka@nationalgrideso.com

07790 778 560

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What is the issue?

It has become apparent that the requirements on OFTOs to provide access to reactive power capability at low windfarm outputs are unclear with the consequence that there have been instances when reactive capability has been withheld. Having predictable and firm access to reactive capability is essential to the ESO in operating the system. Where this cannot be assured it leads to the ESO having to spend money in taking additional operational actions.

Why change?

This modification seeks to clarify that where reactive capability is available at low windfarm outputs, access to this by the ESO should be provided by the OFTOs.

The particular case that this seeks to address is where, as part of an offshore windfarm connection, onshore reactive compensation has been installed often to compensate for the capacitive impact of an offshore cable network. At low windfarm outputs clearly this onshore reactive capability remains and if it is instructable by the ESO is a considerable help in maintaining system voltage within acceptable limits.

What is the proposer's solution?

OFTOs are generally required to fulfil SQSS voltage obligations, and the provision of reactive range is set out in the STC section K which stems in turn from the requirements on generators as set out in the Grid Code.

Below 20% output, while OFTOs may continue to provide voltage control utilising any available reactive capability this is not set out as a definitive obligation. It is proposed to make minor changes to the STC text to confirm that any reactive capability that is available should be provided when requested by the ESO. This change will not require any changes to equipment but will help to clarify an area of uncertainty.

Following discussions with the OFTOs it is apparent that there are concerns regarding the regular utilisation of reactive equipment, for example synchronous compensators, for general system reasons rather than as part of the compliant operation of a windfarm, and the additional costs that might be incurred associated with wear and tear. However, the ESO still needs to determine the overall most efficient solutions for consumers which in this case are likely to be using the equipment that is already there rather than prompting further system reinforcements.

The legal text has been written and revised to try to achieve a balance while helping to clarify that equipment that forms part of a TO or OFTOs regulatory asset base should generally be available unless there is good reason.

Draft legal text

The operating envelope of a power park module is set out as follows in the Grid Code:

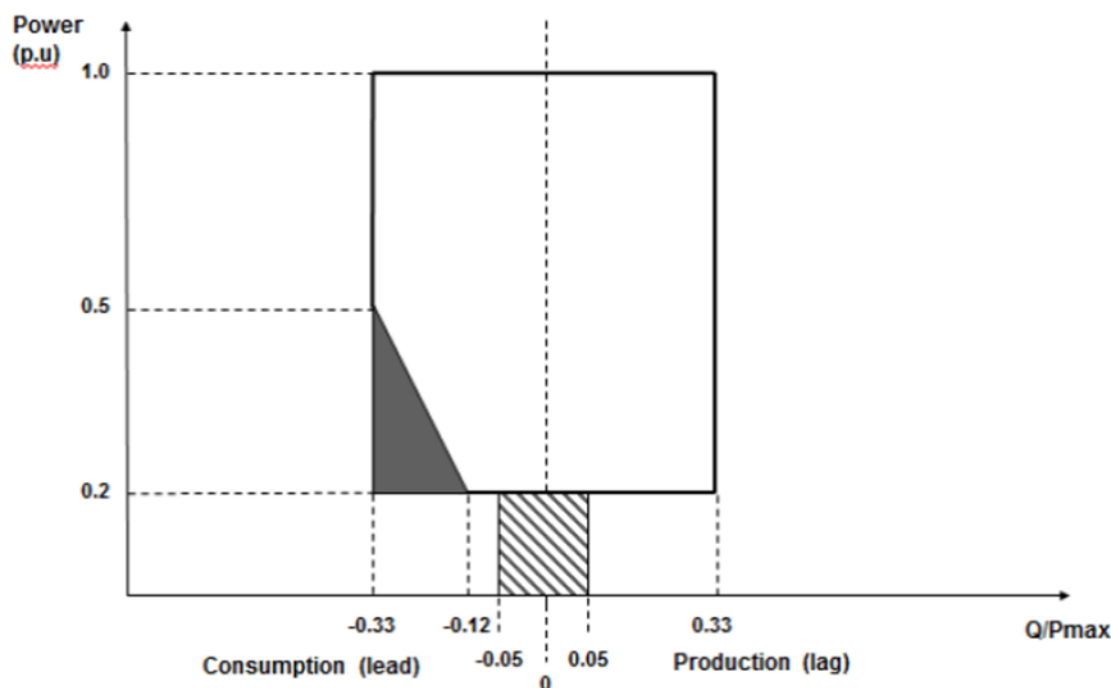


Figure ECC.6.3.2.4(c)

This diagram sets out the expected operating envelope for a power park module in terms of its reactive range at varying active power outputs, being expressed as a maximum requirement (the thick black line) down to 20% of active power output. Further details are in the text (ECC6.3.2.4.4) which accompanies the diagram.

The two shaded areas are not within the expected requirement for PPMs and there is not a definitive reactive requirement below 20% output for PPMs although ECC.6.3.8.4.1 states:

'When operating below 20% Maximum Capacity the automatic control system may continue to provide voltage control using any available reactive capability. If voltage control is not being provided, the automatic control system shall be designed to ensure a smooth transition between the shaded area below 20% of Active Power output and the non-shaded area above 20% of Active Power output.'

These requirements in the ECC section apply to more recent generators, generally those commissioned after April 2019, and to whom the Requirements for Generators (RfG) European Network Code (as retained in GB law) applies. There are similar requirements in the CC section (CC6.3.2(c)) which apply to older generators.

In the STC, the requirements on OFTOs for reactive range stem from this and are set out in Section K: TECHNICAL, DESIGN AND OPERATIONAL CRITERIA AND PERFORMANCE REQUIREMENTS FOR OFFSHORE TRANSMISSION SYSTEMS, annex 1 for pre-RfG equipment and annex 2 for post-RfG.

The proposed legal text changes are as follows shown as red mark-up:

STC Section K Annex 1

2.4 When transferring Active Power equivalent to less than 20% of the Interface Point Capacity:

2.4.1 the automatic control system may continue to provide voltage control utilising any available reactive capability and, if applicable, as instructed by The Company *where this can be achieved without unduly affecting such equipment. For the avoidance of doubt this is not an absolute design requirement;*

2.4.2 If voltage control is not being provided:

(a) the automatic control system shall be designed to be capable of a smooth transition between the shaded area bounded by CD and the non-shaded area bound by AB in Figure K1 below; and

(b) the Reactive Power delivered at the Interface Point shall be within a range of $\pm 5\%$ of the Interface Point Capacity expressed in MVar.

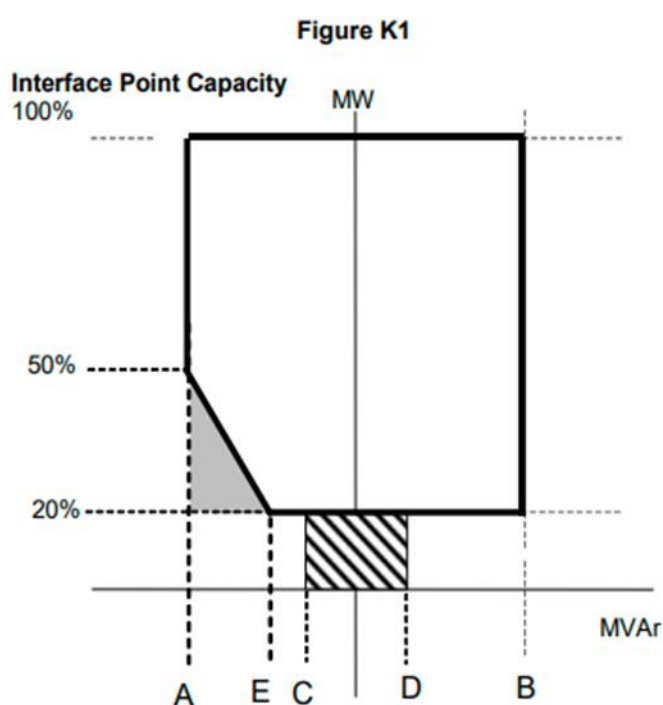


Figure K1

STC Section K Annex 2

1.3.2 The Reactive Capability requirements at the Interface Point applicable to Offshore Transmission Licensees are the same as EU Generators undertaking OTSDUW Build as defined in ECC.6.3.2.4. The Reactive Power capability that an Offshore Transmission System must be able to provide at the Interface Point may be delivered using a combination of Plant owned by the Offshore Transmission Owner concerned and Plant owned by a Generator or Generators connected to that Offshore Transmission System. Where Generator Plant is out of service, the Reactive Power capability requirements will be reduced pro-rata to the maximum Active Power capability of Generator Plant in service.

1.3.2.1 When transferring Active Power equivalent to less than 20% of the Interface Point Capacity, the automatic control system may continue to provide voltage control utilising any available reactive capability and, if applicable, as instructed by The Company where this can be achieved without unduly affecting such equipment. For the avoidance of doubt this is not an absolute design requirement;

What is the impact of this change?

Proposer's assessment against STC Objectives

Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	Positive [Please provide your rationale]
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	Positive By ensuring the availability of reactive equipment this will help the ESO to efficiently operate the system
(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	Neutral [Please provide your rationale]
(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	Positive [Please provide your rationale]
(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	Positive Helps to clarify an area of 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;	Neutral [Please provide your rationale]
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	Neutral [Please provide your rationale]

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Positive Helps to ensure cost effective and secure operation of the system.

Lower bills than would otherwise be the case	Positive In clarifying the availability and use of existing equipment this modification avoids the ESO having to over-invest in additional reactive support.
Benefits for society as a whole	Positive Efficient and secure operation of the electricity transmission system.
Reduced environmental damage	Neutral Click or tap here to enter text.
Improved quality of service	Neutral

When will this change take place?

Implementation date

10 Working days after the Authority's decision

Date decision required by

As soon as Possible

Implementation approach

OFTOs will need to be aware of this change to make sure that reactive capability is available unless there is a good reason for it not to be – such as a fault or ongoing maintenance.

Proposer's justification for governance route

Governance route: Self-Governance modification to proceed to Code Administrator Consultation

This modification is a minor clarification only; no changes to equipment will be required and there is no impact on any parties other than it providing the ESO with some helpful certainty in the availability of reactive power, an essential part of operating the system.

Guidance on governance routes		
Timescales	Route	Who makes the decision (Governance type)
Normal	Proceed to Code Administrator Consultation*	Authority (Standard Governance) or Panel (Self-Governance)
	Assessment by a Workgroup**	
Urgent	Proceed to Code Administrator Consultation	Authority (Standard Governance)
	Assessment by a Workgroup	
Fast-track	Straight to appeals window, then implementation	Panel (Self-Governance)
<p>* This route is for modifications which have a fully developed solution and therefore don't need to be considered by a Workgroup.</p> <p>** For modifications which need further input from industry to develop the solution.</p>		
Self-Governance Criteria		
<p>It depends on the material effect of the modification as to whether it should be subject to Standard or Self-Governance. If you are proposing that your modification should be subject to Self-Governance, you must explain how it meets the below criteria.</p> <p>The modification is unlikely to discriminate between different STC Parties and is unlikely to have a material effect on:</p> <ul style="list-style-type: none"> Existing or future electricity customers; Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity, The operation of the National Electricity Transmission System Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies The STC Panel's governance procedures or the STC Panel's modification procedures 		
Urgency Criteria		
<p>If you are proposing that your modification is Urgent, you must explain how it meets Ofgem's Urgent criteria (below). When modifications are granted Urgency, this enables the us to shorten the standard timescales for industry consultations. Note that the we (Code Admin) must seek Authority approval for this option.</p> <p>Ofgem's current guidance states that an urgent modification should be linked to an imminent issue or a current issue that if not urgently addressed may cause:</p> <ul style="list-style-type: none"> A significant commercial impact on parties, consumers or other stakeholder(s); or A significant impact on the safety and security of the electricity and/or gas systems; or A party to be in breach of any relevant legal requirements. 		
Fast-Track Self-Governance Criteria		
<p>This route is for modifications which are minimal changes to the code. E.g. Typos within the codes. If you are proposing that your modification should be subject to Fast-Track Self-Governance, you must explain how it meets the below criteria.</p> <p>The modification is a housekeeping modification required as a result of an error or factual change, such as:</p> <ul style="list-style-type: none"> Updating names or addresses listed in the STC; Correcting minor typographical errors; Correcting formatting and consistency errors, such as paragraph numbering, or; Updating out of date references to other documents or paragraphs. 		

Interactions

- ☐ Grid Code
☐ European
Network Codes
- ☐ BSC
☐ Other
modifications
- ☐ CUSC
☐ Other
- ☐ SQSS

[Explain how this modification interacts with other codes, industry documents, modifications or industry projects.]

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CM	Code Modification
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards

Reference material

- Add links to reference material