

Code Administrator Consultation Response Proforma**GC0163: GB Grid Forming (GBGF) - Removal of Virtual Impedance restriction**

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 **02 May 2024**. 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 Elana Byrne Elana.Byrne@nationalgrideso.com or grid.code@nationalgrideso.com.

Respondent details	Please enter your details	
Respondent name:	Martin Aten	
Company name:	Uniper	
Email address:	Martin.aten@uniper.energy	
Phone number:	07738604327	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

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 in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <p>Original <input checked="" type="checkbox"/>a) <input checked="" type="checkbox"/>b) <input checked="" type="checkbox"/>c) <input type="checkbox"/>d) <input type="checkbox"/>e)</p> <p>The increased design flexibility of allowing virtual impedance better facilitates a) (allows cost saving), b) (can increase competition), c) (can increase security and efficiency) and is neutral for d) and e).</p>
2	Do you have a preferred proposed solution?	<p><input checked="" type="checkbox"/>Original <input type="checkbox"/>Baseline <input type="checkbox"/>No preference</p> <p>Removing the virtual impedance restriction will provide greater design flexibility for more cost-effective designs of grid forming converters.</p>
3	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>
4	Do you have any other comments?	It is normally preferable that the Grid Code does not dictate how a requirement is achieved by a specific design method, but just clearly describes the performance requirements at the outputs of Users' devices to meet its objectives.