

GC0102 EU Connection Codes GB Implementation – Mod 3

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 by **5pm on Thursday 9th November 2017** to grid.code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be forwarded to grid.code@nationalgrid.com with subject clearly stating 'GC0102 Consultation Query'

Respondent:	<i>Graeme Vincent, graeme.vincent@spenergynetworks.co.uk</i>
Company Name:	<i>SP Energy Networks</i>
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity ii. To facilitate 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) iii. 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 iv. 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 v. To promote efficiency in the implementation and administration of the Grid Code arrangements

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0102	Yes, GC0102 better facilitates the Grid Code (and

	Original Proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Distribution Code) objectives as the proposals discharge obligations imposed by the Electricity Regulation and the European Commission.
2	Do you support the proposed implementation approach?	Yes, although given the interdependencies between the three separate modifications which are now beginning to appear it would be better to consider the three modifications (GC0100, Gc0101 and GC0102) as one going forward. In this way stakeholders will be able to see all the proposed changes and legal text as one document and be able to see how the definitions flow between each of the separate sections of draft legal text.
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No.

Specific GC0102 Consultation Questions

Q	Question	Response
5	Do you have any comments on the structure of the proposed relationship between the D Code, G59 and G83, and G98 and G99? In particular which of the three options in Section 3.2 of this consultation do you support and why?	We are aware of the significant stakeholder interactions which the developers of the proposed text have undertaken and support the preferred approach (Option 3) as being the most suitable compromise in meeting all stakeholders' requirements.
6	Do you agree with the organization of G99 and how it applies to the different Types of generation? Do you have any alternative suggestions for structure?	We believe that the current format of G99 is a good basis on which to further engage with stakeholders to further refine the document structure.
7	Do you agree with the current view of how the Grid and Distribution Codes (and G98 and G99) will be applied to installations where new PGMs are installed alongside existing pre-RfG equipment? (see	Yes – it is beneficial for examples to be provided which will allow all stakeholders to understand how these situations will be considered.

	page 11)	
8	Do you agree on the introduction of a Preliminary Operation Notification relating to the Compliance process for Transmission connected Type B and Type C PGMs? (See <i>Workgroup discussions section</i>)	Whilst we recognise that the Preliminary Notification Process is not an explicit requirement within the RfG for Type B and C PGMs and therefore could be considered as a more stringent requirement, we do understand and appreciate that it is a pragmatic solution for a practical requirement in the connection process for Transmission Connected type B & C PGMs.
9	Do you agree with the retaining of the current GB arrangements for automatic connection and reconnection and the logic for it? If not, what alternative should be proposed? (see section 4.1.2.2)	Yes we agree to retaining the existing approach.
10	Do you consider any parts of the proposed compliance, simulation or testing requirements for distribution-connected generators to be disproportionately onerous? (See section 5.2.5)	No, where there well developed and robust processes exist for Transmission Connected generation then it seems sensible to adopt and adapt these to suit distribution connected generation.
11	Do you agree it is appropriate to drop the designation Large and Small from the Distribution Code as proposed in section 3.3.1 of this consultation? Do you believe it is appropriate to drop the designation Large, Medium and Small from the Grid Code?	We had assumed, that following the introduction of the RfG then the Large, Medium and Small (LMS) designation would be inappropriate and cease to be used as Type A, B C and D would apply across the GB and any regional differences would also disappear. It was therefore a surprise to see the proposed continued use of these terms and believe that it is potentially confusing for connecting parties going forward. However, it is recognised that the imminent deadlines to ensure compliance with RfG will effectively limit the opportunity for these regional differences to be removed across all codes impacted by the use of terms Large, Medium and Small. We support the removal of Large and Small from the Distribution Code, but note that due to NGET decision to retain LMS terminology that Medium will need to be maintained to cater for embedded medium plant (LEEMPS) connecting to the Distribution Network.
12	Do you have any comments on the draft requirements for fault recording equipment for distribution-connected Type C PGMs as drafted in Section 13.11 and Appendix C3	We have contributed to the drafting of these sections and therefore await comments from other stakeholders on the proposed requirements.

	of G99?	
13	Do you agree that it is appropriate to include storage in G98 and G99, noting that as storage is explicitly excluded from the RfG, the technical requirements that arise solely from the RfG are not applied to storage in G09 and G99?	We agree with the proposed inclusion noting that storage is specifically excluded from the RfG. However, in order to provide clarity for Users we believe that it is important for connection related processes to be retained together but also noting that the drafting of the document excludes the RfG requirements being applied to this technology.
14	Do you agree that it is appropriate to include Type A PGMs <800W in capacity in G99, noting that those technical requirements that emanate from the RfG are not applied to PGMs <800W?	Yes – inclusion within one document we believe offers a certain degree of clarity for all Users as the connection processes apply equally within GB. We further note that the drafting of G99 specifically excludes the RfG provisions from applying to these particular Users.
15	If you do not consider the proposed solution to sufficiently harmonise the connection requirements for new parties connecting to the transmission and distribution networks, how would you propose this to be addressed? (See <i>Workgroup discussions section</i>)	It is noted that the development of the proposals have been undertaken through a joint working group and have harmonised requirements where practicable.
16	G98 and G99 include specific requirements for power quality, harmonic compliance etc. Do you believe it should be possible to use other international standards or requirements to achieve these ends such that these specific requirements can be dropped from these documents? An explanation of your views would be useful.	As a networks operator we believe that it is appropriate for generators to comply with power quality requirements. However, we are aware of the ongoing engagement with stakeholders in this area.
17	Do you agree that the explanation of type testing, both full and partial, and the inclusion of equipment certificates, is sufficiently clear and unambiguous in G99 drafting? Please make any suggestions that could add clarity.	Yes we are in agreement though recognise that there is always room for improvement and look forward to receiving feedback from and engaging further with stakeholders to improve clarity.
18	The application of new technical requirements to non-type tested generation connecting to distribution networks will give rise to new processes etc. Please comment on how comprehensive the coverage of this is in the current drafting of G99 and please suggest any improvements	No particular comment but as DNO involved in the drafting process we would be keen to hear stakeholders views in this area which would allow us to work with the other DNOs and the ENA to improve these processes and the wording within G99.

19	Do you have any views on how the data and information required and articulated within G99 can or should relate to the Distribution Data Registration Code in the Distribution Code?	As above we would be keen to hear stakeholder's views in this area.
20	Do you believe that this modification helps to promote transparency across the Industry and if not which areas should be improved? (see <i>Workgroup discussions section</i>)	Yes we believe that this modification and the associated documents are a good start in promoting transparency but realise that there is a significant amount of documentation being created by this implementation process. This is likely to require network operators to undertake further briefing and education sessions with stakeholders.

Legal drafting questions

Q	Question	Response
21	The Proposed draft Grid Code legal text contains a number of comments incorporating both internal and workgroup comments. Please feel free to provide further comment on the documents (Annex 1-5)	No response
22	Do you have any views on the structure of the Grid Code drafting for System Management and Compliance? (Annex 1-5)	No response
23	Are there are any areas in the Grid Code or Distribution Code drafting which you do not believe reflect the requirements of the RfG or HVDC Codes and, if so, why do you believe they are deficient? (Annex 1-9)	No response
24	Please make any other comments on the legal text drafting for the Distribution Code, G98 and G99 using the appropriate templates issued with this consultation.	No response