

## 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 9<sup>th</sup> November 2017** to [grid.code@nationalgrid.com](mailto: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](mailto:grid.code@nationalgrid.com) with subject clearly stating 'GC0102 Consultation Query'

<b>Respondent:</b>	Nigel Turvey <a href="mailto:nturvey@westernpower.co.uk">nturvey@westernpower.co.uk</a>
<b>Company Name:</b>	Western Power Distribution
<b>Please express your views regarding the Workgroup Consultation, including rationale.</b>  <b>(Please include any issues, suggestions or queries)</b>	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>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)</li> <li>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</li> <li>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</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements</li> </ul>

## Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0102	Given the legal necessity of implementing the RfG

	Original Proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	we agree that the GC0102 proposals better facilitate both the Grid and Distribution Code objectives.
2	Do you support the proposed implementation approach?	Yes – although as above it would be more efficient to combine GC0100, GC0101 and GC0102
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	<i>If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website, <a href="http://www2.nationalgrid.com/uk/industry-information/electricity-codes/grid-code/modifications/forms-and-guidance/">http://www2.nationalgrid.com/uk/industry-information/electricity-codes/grid-code/modifications/forms-and-guidance/</a> and return to the Grid Code inbox at <a href="mailto:grid.code@nationalgrid.com">grid.code@nationalgrid.com</a></i>

## 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 believe that the option now alighted on, post recent discussions with stakeholders, is a reasonable compromise. It has the benefit of being the simplest division of documents for new installations compared to existing in that micro generation (ie less than 16A per phase) will refer only to G98 (cf G83 for existing) and all other generation will refer to G99 (cf G59 for existing).
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?	The current draft represents a good basis.
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	This is a very important practical point and we are pleased to see that some clear examples have been laid out in 6.1.5 of G99. It will be important to ensure that these examples are fully accepted as illustrative of the legal situation that will apply in such cases by all stakeholders, including Ofgem

	page 11)	and BEIS.
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> )	In principle yes. We not however that this is being portrayed by some stakeholders as a new (and arguably therefore more stringent) requirement. We do not believe this to be the case and believe that it should be presented as either (or both) a relaxation on the full EON/ION/FON process for smaller generating plant, or as a formalization of something that happens anyway, but not codified.
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. Pending any decisions to change the fundamental approach in GB, the status quo should be maintained.
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)	As we work through the new requirements placed on smaller embedded generators, it has obviously been sensible to consider using well developed process that apply to larger transmission connected plant. We expect to continue to work with stakeholders to examine the requirements in more detail over the next couple of months.
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?	DNOs believed that National Grid shared the widespread view that it was inappropriate to retain Large, Medium and Small, and the associated regional differences, as the RfG and the other EU Codes are implemented. Discussions along these lines started probably as far back as 2013. It was therefore a surprise when National Grid announced that regional differences would remain in place and that generation stakeholders would need to be classified into Large, Medium or Small and also into Types A to D. Given the imminence of the compliance deadlines, we agree that it is now inappropriate to try to unpick the regional differences. Nevertheless we support the removal of the terms Large and Small from the Distribution Code, noting that it is necessary to retain Medium because the retention of regional differences means that Embedded Medium Power Stations will retain their complex LEEMPS status.
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 of G99?	No

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 understand how difficult it would be for Ofgem to approve an approach that applied the new GB documentation to storage, given it is explicitly excluded from the RfG.
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, GB process apply to all generation, irrespective of its size or ability to also act as demand. Therefore it is appropriate to include these technologies in G99. We note that the drafting specifically excludes the RfG provisions from applying to these technologies.
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> )	-
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.	We believe it is an absolute requirement that generating equipment should meet relevant PQ standards. However we are still exploring with stakeholders what is the best way to seek assurance that manufacturers have paid appropriate heed to the standards and that equipment is compliant.
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.	We think the efficiencies from manufacturers' type testing, and equipment certificates in the future, are essential and we believe that the requirements in G98 and G99 form a good basis for continuing discussions with manufacturing stakeholders to refine and improve processes.
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	We are continuing to work with other DNOs, the ENA and stakeholders to refine and improve the processes and drafting of G99.
19	Do you have any views on how the	This is an area where all DNOs would welcome

	data and information required and articulated within G99 can or should relate to the Distribution Data Registration Code in the Distribution Code?	feedback from stakeholders.
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> )	There is a significant education and briefing need that the network licensees need to undertake with stakeholders from this point forward.

## 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)	
22	Do you have any views on the structure of the Grid Code drafting for System Management and Compliance? (Annex 1-5)	
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)	
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.	