Grid Code Workgroup Consultation Response Proforma

GC0100 EU Connection Codes GB Implementation – Mod 1

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 **2 October 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 addressed to Chrissie Brown at Christine.brown1@nationalgrid.com

Respondent:	*Paul.youngman@drax.com*
Company Name:	*Drax power limited*
Please express your views regarding the Workgroup Consultation, including rationale. **(Please include any issues, suggestions or queries)**	*For reference, the Grid Code objectives are:* 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 GC0100 Original proposal, or any potential alternatives for change that you wish to suggest, better	GC0100 satisfies objective (iv) to the extent that it introduces into the Grid code EU Regulation 2016/631. The modification can also be seen as enabling aspects of Objective (i) and (iii) relating to

	facilitates the Grid Code Objectives?	the efficient maintenance and operation of the system and enhancing aspects of security of supply. It is not clear that the provisions and method of implementation will satisfy and enhance competition (ii) or that the chosen option of a wider implementation scope, rather than a narrow minimum implementation meets the efficiency criteria in section (v)
2	Do you support the proposed implementation approach?	We offer qualified support of the proposals. From workgroup discussion it is clear that the proposer has included all changes mandated by the regulation to ensure compliance, and also defined additional requirements that are not mandated. We feel it may have been more efficient to implement an enabling mod that would implement the EU requirements, and then separately define elements that need to be enhanced in the national codes.
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	*If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website, http://www2.nationalgrid.com/uk/industry-information/electricity-codes/grid-code/modifications/forms-and-guidance/ and return to the Grid Code inbox at grid.code@nationalgrid.com*

Specific GC0100 questions

Q	Question	Response
1	Removing More Stringent Requirements' concerns have been expressed by some Workgroup members that applying more stringent requirement on newly connecting parties (that fall within this scope of the EU Network Codes for generation, demand and HVDC systems) maybe incompatible with EU law. Do you have any views on this topic that could assist the Workgroup when they	There is general agreement that the proposals introduce more stringent arrangements. The proposer provided information, consultants studies and explanations to outline the merit of theses 'more stringent' requirements. As a general rule minimum implementation of EU law into national codes is the preferred method of adoption. It is also clear that there is divergence between the proposer and others workgroup members regarding interpretation and compatibility of introducing more stringent arrangements, and the existing commitments made within the EU codes and regulation.

	are considering the topic in due course?	
2	Are you comfortable with using the EU definition of Maximum Capacity instead of the GB definition of “Registered Capacity”?	Yes
	Fast Fault Current Injection questions	
3	What are your views on options 1, 2 and 3 as set out in paragraph 4.4 for Fast Fault Current Injection and which option (if any) would you prefer?	The proposer highlights option 1 as their preferred option, highlighting that options 2 and 3 would need further development through an expert working group. We support the proposer on the basis that this would not preclude future development of options 2 and 3 by industry parties.
4	Do you have any alternative fast fault current injection solutions noting that the requirement applies to the Converter not the wider Power System?	No
5	In considering the three Fast Fault Current Injection options 1, 2 and 3 in paragraph 4.4 do you have any comments in relation to technology readiness, cost implications, and can they be implemented date within the context of product development timescales?	No
6	Do you have any evidence to support your views?	N/A
7	Do you have any views on the specific costs related to the additional requirements?	N/A
8	Is the current proposed wording for the remote end HVDC and DC Connected Power park modules sufficient to facilitate future new technology?	N/A
	Banding questions	
9	What are the specific costs related to the additional requirements?	We have no further information on specific costs other than to note that developers and operators will face additional costs due to any additional equipment and processes required to ensure compliance.
10	Do you have any views on the banding thresholds for the original and those suggest for the possible alternative?	No

11	Can you provide any feedback/comments on the associated legal text?	N/A
	Fault Ride Through	
12	Do you support the fault ride through voltage against time curves If not please state why you disagree, what alternative you would recommend and your justification for any alternative?	Yes, and we would expect that this would minimise impacts to the underlying resilience of the network. We would also reasonably expect that significant changes to network characteristics would be notified to relevant parties.
13	Do you have any specific views about the proposal to modify the stage 2 under voltage protection for distributed generation interface protection?	No
	Other questions	
14	Does the Legal drafting contained in annex 2 and 3 deliver the intent of the solution outlined in section 3?	It is currently unclear, given that the legal text is yet to be finalised, that the text reflects the intent of all the aspects of the modification.
15	Do you have any information based on the proposed solution in respect of implementation costs?	No