Grid Code Workgroup Consultation Response Proforma

GC0101 EU Connection Codes GB Implementation – Mod 2

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:	*Alastair Frew*
Company Name:	ScottishPower Generation Ltd
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 GC0101 Original proposal, or any potential alternatives for change that you wish to suggest, better	Yes as it implements European Law.

	facilitates the Grid Code Objectives?	
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	There is no question asking about legal text. I have the following legal text comments:- ECC.6.1.4.2.2 2nd sentence the word" voltage" has been replaced by the word "greater" where it should have been the word "wider" that was replaced. There are 2 sections numbered ECC.A.8.1.2 ECC.A.8.2.2.4 refers to the enclosed area with the points ABCDEFGH in figure ECC.A.8.2.2b the points are not referenced on the figure. ECC.A.8.2.2.6 refers to lines EF on figure EEC.A.8.2.2b which is not shown it also refers to line AB on figure EEC.A.7.2.2b, I assume it should be the figure EEC.A.8.2.2b and again line not shown Similarly ECC.A.8.2.2.7 refers to lines which are not shown. ECC.6.3.7.1.3 still has the reference "Gensets" in its text should this still be there.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

Specific GC0101 questions

Q	Question	Response
1	As set out under 'Potential Alternatives - (a) 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	Same response as in GC0100 as follows:- Looking at the third package it consists of a number of directives and regulations, with the two key pieces of legislation related to requirements on electricity providers being "Directive 2009/72/EC common rules for the internal market in electricity ..." and "Regulation 714/2009 on conditions for access to the network for cross-border exchanges in electricity ...". These two pieces of legislation seem to split requirements into two with 2009/72/EC dealing with the safety and minimum technical requirements, whilst 714/2009 deals with setting

	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 are considering the topic in due course?	cross-border rules on trade, energy flows and charging. In terms of 2009/72/EC when this was introduced in 2012 with GB responding indicating its minimum technical requirements were as follows "Article 5: Electricity Safety, Quality and Continuity Regulations 2002, Electricity Transmission Licence, Electricity Distribution Licence, Electricity Interconnector Licence attached. Technical codes including the Grid and Distribution Codes may be found at *http://www.ofgem.gov.uk/Licensing/ElecCodes/Pages/ElecCode.aspx* " Currently this consultation is dealing with the "Regulation 2016/631 Requirements for grid connection of generators" which has been produced as a deliverable from 714/2009. Given the scope of 714/2009 it is surprising that such a technically detailed version of 2016/631(RFG) has been produced on the bases of a three word title in Article 8 paragraph 6 (b) "network connection rules;", however we are where we are. Specifically dealing with no more stringent requirements, this seems to be based on a premise that any technical requirements not included in the connection codes 2016/631(RFG), 2016/1388(DCC) or 2016/1447(HVDC) are more stringent, and hence is not permissible. As previously stated minimum technical requirements are detailed within 2009/72/EC and not 714/2009 which defines the criteria for 2016/631(RFG). This is further emphased in the opening whereas section of 2016/431(RFG) in item (2) second sentence states "..... In addition Article 5 of Directive 2009/72/EC of the European Parliament and of the Council (2) requires that Member States or, where Member States have so provided, regulatory authorities ensure, inter alia, that objective technical rules are developed which establish minimum technical design and operational requirements for the connection to the system. ..." . This indicates that 2016/631(RFG) is an addition to any rules set by 2009/72/EC. Moreover it is clear that it was not the indention for the new network codes to remove existing national codes as 714/2009 which defines the requirements for drafting the network codes has in Whereas (7) third sentence "The network codes prepared by the ENTSO for Electricity are not intended to replace the necessary national network codes for non-cross-border issues." Given the above there does not seem to be any justification for the premise that technical requirements not included in the network codes are more severe and should not be allowed. In summary in GB the current accepted minimum technical standards appear to be the Electricity Safety, Quality and Continuity Regulations 2002, Electricity Transmission Licence, Electricity Distribution Licence, Electricity Interconnector Licence, the Grid and Distribution Codes with additional requirements of the network codes being added as they are enacted. The only issue which may exist is which version of the

		various documents is currently the approved version. Following the initial submission in 2012 there does not appear to be any clear evidence that the modification process in "Directive 98/34/EC laying down a procedure for the provision of information in the field of technical standards and regulations" has been followed.
2	Do you agree that the comments raised from the GC0048 voltage/reactive consultation have been addressed, in particular those relating to the Offshore reactive range. If not please advise why these issues have not been addressed?	Yes
3	Do you agree that the comments raised from the GC0087 frequency response consultation have been addressed; if not please advise why these issues have not been addressed?	Yes
4	Do you agree with the proposed voltage/ reactive and frequency requirements (including associated diagrams and parameters) captured under the HVDC Code are reasonable? If not please advise why.	Yes
5	Do you have any views on the time durations proposed for the frequency ranges defined in the Annex I of the HVDC Code? The time durations must be longer than those stipulated for RfG, however is there any materiality for an HVDC System in setting a value longer than that required under the RfG Code.	No

6	Do you believe it is reasonable to require HVDC Systems, DC Connected Power Park Modules and Remote End HVDC Converter Stations to meet similar requirements to Type D Power Park Modules defined under RfG? If not please state so.	Yes
7	Do you agree that the Offshore Transmission Arrangements (OTSDUW) should be included as part of the drafting?	Yes