

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:	<i>Please insert your name and contact details (phone number or email address)</i>
Company Name:	<i>Please insert Company Name</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 GC0101 Original proposal, or any potential alternatives for change	Yes, I agree that the Original proposal facilitates the RfG national implementation for Voltage + reactive and frequency response provisions.

	that you wish to suggest, better facilitates the Grid Code Objectives?	
2	Do you support the proposed implementation approach?	Yes, we support the proposed approach.
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, 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</i>

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 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?	Although I am not fully aware of legal reasoning provided by alternative proposer, we believe any requirements that are existing in the current Grid Code and planned to taken forward with RfG should be thoroughly reviewed and CBA is conducted to verify this. From an Offshore Wind perspective, this is applicable for all the requirements planned to be taken forward for OTSDUW equipment.
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?	We believe the comments raised in the GC0048 voltage + reactive consultation are addressed in the GC0101 report especially in regard to Configuration 1 AC Connected Offshore Power Park Modules.
3	Do you agree that the comments raised from the GC0087	Yes.

	frequency response consultation have been addressed; if not please advise why these issues have not been addressed?	
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.	We agree with the proposed requirements.
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.	We believe the DC connected power park modules requiring to deliver/absorb Q at the connection point is not a valid requirement due to inherent nature of HVDC which cannot transfer the reactive power.
7	Do you agree that the Offshore Transmission Arrangements (OTSDUW) should be included as part of the drafting?	We believe the inclusion of OTSDUW in this should be assessed via CBA. We believe, the existing requirements on OTSDUW in addition to RfG requirements will be onerous on developers.