

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>Isaac Gutierrez</i> <i>Senior Electrical Engineer</i> <i>Telephone number work: 01416143104</i> <i>Mobile: 07761693652</i> <i>Email: igutierrez2@scottishpower.com</i>
Company Name:	<i>Scottishpower Renewable Ltd (UK)</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. Impact of this consultation on this objective is neutral 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).. Impact of this consultation on this objective is neutral 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. Impact of this consultation on this objective is neutral 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 . Impact of this consultation on this objective is negative as National Grid in trying to implement more onerous requirement is not complying with European Law v. To promote efficiency in the implementation and



	administration of the Grid Code arrangements. Impact of this consultation on this objective is neutral as the consultation seems to be rushed in a not very efficient manner
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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 facilitates the Grid Code Objectives?	Yes, to some extent but please refer to comment within SPR response to this consultation.
2	Do you support the proposed implementation approach?	No, timescales are too short which are not allowing current wind farm tenderers to exactly know what grid code requirements they have to meet. The implementation date of 17 May 2018 does not provide enough room for timely decision making in regards to electrical balance of plant and wind turbines electrical specifications. SPR considers that a grace period should be implemented until December 2018 so any contract signed after December 2018 should comply with the Grid Code changes otherwise the implementation date of 17 May 2018 will highly impact developers.
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	Although currently most SPR power generating plant is able to meet the current UK Grid Code requirements, there is certainly opposition from SPR to National Grid applying more stringent requirement than those currently in RfG to new generators as

	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?	definitively there will be an impact in CAPEX and OPEX. SPR believes that there is incompatibility with European Law as some of the requirements that National Grid is trying to implement are more onerous than those set out in RfG
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?	Agree
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?	<p>No. SPR raised the issue that windfarm cannot respond to LFSM-U unless the windfarm deload as required for FSM. It is not clear from the current consultation what is expected for windfarms in regards to LFSM-U. SPR believe that the requirements need to be clearer for windfarms otherwise it should not be a mandatory requirement. Also SPR disagree with National Grid response in regards to inertia as wind turbines have some inertia but not enough as required by National Grid. Please refer to embedded annex 2 with National Grid responses where SPR highlight National Grid comments that have not been fully addressed during the current consultation. In addition, SPR made comments in regards to droop and ASBMON that not seem to have been included in Annex 2 or even been considered.</p> <div style="text-align: center;">  Workgroup Consultation Annex 2 </div> <div style="text-align: center;">  Frequency Response Provisions Response ! </div>
4	Do you agree with the proposed voltage/ reactive and frequency requirements (including associated diagrams and	No, Voltage ranges for DC connected power park modules are beyond those requested in RfG. This for a DC connected windfarm can definitively increase CAPEX and OPEX

	parameters) captured under the HVDC Code are reasonable? If not please advise why.	
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, there is no point on setting values longer than those required in RfG. Again National Grid is trying to apply a requirement that is more onerous than that in RfG requirement
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.	No, as per boundaries shown in figure 5.1 (b) Tittle III will apply definitively offshore for DC connected power park modules. There will be an impact on the equipment to meet the requirement in the offshore DC platform and those requirement in the onshore connection for the proper operation of the system (cost increase is very likely).
7	Do you agree that the Offshore Transmission Arrangements (OTSDUW) should be included as part of the drafting?	Yes