

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:	Andy Vaudin andrew.vaudin@edfenergy.com
Company Name:	EDF ENERGY
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 electricityii. 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 wholeiv. 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; andv. 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, we agree that GC0101 Original proposal facilitates the Grid Code objectives.

	that you wish to suggest, better facilitates the Grid Code Objectives?	
2	Do you support the proposed implementation approach?	We support the proposed implementation approach of amending the existing Grid Code and Distribution Code.
3	Do you have any other comments?	None
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 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?	<p>We are not of the view that the Original proposal would apply more stringent requirements than the EU Network Codes allow.</p> <p>We are not clear what form the Grid Code would take under any "removing more stringent requirements" alternative proposal. A concern would be that many important requirements within the existing Grid Code would not be applicable to plant covered by the EU Codes. As an example, it could mean that the recent GC0077 sub-synchronous resonance modification was not applicable to new plant. It is our view that by removing important elements of the Grid Code, the "removing more stringent requirements" alternative proposal would work against Grid Code objectives (i) and (iii).</p> <p>We would expect National Grid to provide clear guidance to the workgroup as to any legal interpretations behind these "more stringent requirements" concerns.</p>
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?	The report includes the comments and the National Grid responses. We would expect National Grid to inform the workgroup if any of these issues has not been addressed.
3	Do you agree that the comments	The report includes the comments and the National

	raised from the GC0087 frequency response consultation have been addressed; if not please advise why these issues have not been addressed?	Grid responses. We would expect National Grid to inform the workgroup if any of these issues had not been resolved.
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 believe that these requirements are reasonable, based on the system security and operability needs.
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.	We do not have any information on the materiality, if any, of this setting.
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 that these requirements are reasonable, based on the system security and operability needs.
7	Do you agree that the Offshore Transmission Arrangements (OTSDUW) should be included as part of the drafting?	In that these arrangements are included in the existing Grid Code CCs then they should be included as part of the drafting.