Workgroup Consultation Response Proforma

**GC0141: Compliance Processes and Modelling amendments following 9th August Power Disruption**

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 to grid.code@nationalgrideso.com by 5pm on **30 March 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Joseph Henry Joseph.henry@nationalgrideso.com or grid.code@nationalgrideso.com

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| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |

**For reference the Applicable Grid Code Objectives are:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *Facilitating effective 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);*
3. *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;*
4. *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*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.**

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| **Standard Workgroup Consultation questions** |
| 1 | Do you believe that the GC0141 Original Proposal better facilitates the Applicable Objectives? | Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | Click or tap here to enter text. |
| 3 | Do you have any other comments? | Click or tap here to enter text. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?  | Click or tap here to enter text. |
| **Modification Specific Workgroup Consultation questions** |
| 5 | What should the Independent Engineer’s deliverables be with respect to the outcome of the compliance process? | Click or tap here to enter text. |
| 6 | Should there be specific requirements on the retention of data for the User and/or the ESO? | Click or tap here to enter text. |
| 7 | Should the detailed design stage be more clearly identified within the Grid Code? | Click or tap here to enter text. |
| 8 | What stages of implementation would the industry believe are appropriate? | Click or tap here to enter text. |
| 9 | Should the ESO be required to undertake the responsibilities associated with an independent engineer? Please outline your rationale. | Click or tap here to enter text. |
| 10 | Should there be greater definition be given to “substantial modification” given that the self-certification process places the onerous on the User to make these decisions? | Click or tap here to enter text. |
| 11 | Should there be a review of the effectiveness of GC0141 post implementation and after the industry has experience of implementing? | Click or tap here to enter text. |
| 12 | What are your thoughts on the workgroup’s discussions regarding compliance repeat plan? How would this work in regard to Independent Engineer Verification? | Click or tap here to enter text. |
| 13 | Do you believe that screening processes should be applied ahead of detailed dynamic EMT simulation, and if so, do you believe data exchange should support that? | Click or tap here to enter text. |
| 14 | Do you agree that the roles and responsibilities associated with interaction studies should be detailed and clarified, and to what extent? | Click or tap here to enter text. |
| 15 | Do you agree that improved definitions of the types of analysis and definitions suitable analysis environments ahead of the detailed design phase provides useful clarity and minimised project disruption in delivering the principles of this grid code change? Should these form part of legal text or made available with the modification as guidance that may be separately updated from time to time | Click or tap here to enter text. |
| 16 | Do you agree that clarifying roles and responsibility in the management of interaction studies assists more clearly defining the analysis needs of each party, minimising confusion, unnecessary overlap and cost in the design phase? | Click or tap here to enter text. |
| 17 | Do you agree that small signal analysis supporting the screening of interaction cases should be clearly specified within this grid code change, to better focus the range of EMT studies being discussed, and within the context of existing SSTI and SSO analysis better inform assessment of risks and the need for detailed dynamic simulation which includes shaft data for SSTI? | Click or tap here to enter text. |
| 18 | What is your view on the separation of the simplified RMS model and EMT model when it comes to confidentiality, distribution and the protection of IP? | Click or tap here to enter text. |
| 19 | As it currently stands, what is your view on the process by which detailed manufacturer EMT-type models are exchanged for necessary studies as part of project delivery? | Click or tap here to enter text. |
| 20 | Are sections PCA.9.8 and PC.A.9.9 better suited to a guidance document and or should they be included, at least partly, within the legal text? Are there any specific concerns with respect to requirements set out within those sections? | Click or tap here to enter text. |
| 21 | In terms of the requirement for existing users to provide sub-synchronous torsional data for existing plant that may be provided, do you see any issues in regard to the provision of this data? | Click or tap here to enter text. |
| 22 | Should responsibility for interoperability remain with the generator or the ESO, inclusive of interoperability studies such as control interactions and SSCI/SSTI studies? Please provide your reasoning.  |  |