

Workgroup Consultation Response Proforma**GC0138: Compliance process technical improvements (EU and GB User)**

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 **5:00pm** 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

Respondent details	Please enter your details
Respondent name:	Tim Ellingham
Company name:	RWE Generation UK, RWE Supply and Trading
Email address:	Tim.ellingham@rwe.com
Phone number:	07989 321 766

For reference the Applicable Grid Code Objectives are:

- a) *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- b) *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);*
- c) *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;*
- d) *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*
- e) *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.

Standard Workgroup Consultation questions		
1	Do you believe that the GC0138 Original Proposal better facilitates the Applicable Objectives?	We believe it does
2	Do you support the proposed implementation approach?	On the whole we do, though we urge some caution regarding Factory Acceptance Tests in regards to Fault Ride Through as it is our experience that such tests are not carried out on larger WTGs. We also feel there should be some reference/alignment with the LVRT tests in IEC 61400-21
3	Do you have any other comments?	See section 2.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Not currently