

**Code Administrator Consultation Response Proforma****GC0137: Minimum Specification Required for Provision of GB Grid Forming (GBGF) Capability (formerly Virtual Synchronous Machine/VSM Capability)**

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](mailto:grid.code@nationalgrideso.com) by **5pm on 04 October 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Kavita Patel [Kavita.patel@nationalgrideso.com](mailto:Kavita.patel@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Sridhar Sahukari
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**I wish my response to be:**

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

*Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

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

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- To promote efficiency in the implementation and administration of the Grid Code arrangements*

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

Standard Code Administrator Consultation questions		
1	Do you believe that the GC0137 Original Proposal better facilitates the Applicable Objectives?	Yes, we agree that the GC0137 Original Proposal better facilitates the Applicable Grid Code Objectives a, b and c and is neutral with respect to objectives d and e.
2	Do you support the proposed implementation approach?	Yes, we agree with the implementation approach to offer a commercial service to encourage OEMs to develop the technology. In addition, it would be beneficial if NG ESO could also prioritise the track on finalising the arrangement for commercial services.
3	Do you have any other comments?	We have a few other comments for consideration: <ul style="list-style-type: none"><li>- We request that NG ESO also consider other equipment such as synchronous condensers to mitigate any localised inertia or low fault level issues.</li><li>- We also request that NG ESO provide additional network related information (e.g. passive and dynamic/EMT models) such that the design for GBGF can be suitably matured in a simulation environment, before applying the changes in the field.</li></ul>