

Code Administrator 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 **5pm on 03 December 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 Nisar

Ahmed: nisar.ahmed@nationalgridESO.com or grid.code@nationalgrideso.com

| Respondent details | Please enter your details |
|-------------------------|--|
| Respondent name: | Dr. Isaac Gutierrez / Razvan Pabat-Stroe |
| Company name: | ScottishPower Renewables (SPR) |
| Email address: | igutierrez2@scottishpower.com |
| Phone number: | 07761693652 |

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:

- 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 in the right-hand side of the table below, including your rationale.

| Standard Code Administrator Consultation questions | | |
|--|--|--|
| 1 | Do you believe that the GC0138 Original Proposal better facilitates the Applicable Objectives? | Partially, SPR believes that a baseline methodology should be included in the GB Grid Code. The methodology shall indicate what additional FRT studies are required to be performed and under what contingency arrangements or other nonstandard arrangements for onshore/offshore windfarms and HVDC. Although SPR acknowledges that the number of scenarios to simulate could be large, the specifics of the FRT simulation scenarios could be agreed on a per project basis in the BCA, SPR believe there's merit in having a baseline and guidance defined in the GB Grid Code. |
| 2 | Do you support the proposed implementation approach? | The implementation date shall be agreed in similar fashion as the changes done under RfG to the GB Grid Code where a date was agreed that avoided affecting several projects under development with the introduction of new grid code requirements midway project execution. SPR would like to highlight that currently there is a government CfD auction and implementing the changes prior to the CfD deadline will affect the cost of the projects. SPR believe that a grace period shall be included in the implementation of these new changes to the GB Grid Code. SPR would like to highlight that none of the new proposed changes to the GB Grid Code in GC0138 should be applied retroactively |
| 3 | Do you have any other comments? | SPR considers that ECP 10.4 (b) should not be removed from the GB Grid Code as many wind turbine manufacturers still use the MDPR to declare compliance with the FRT requirements of the GB Grid Code in less complex connections/projects. |