

RfG Issues Log – 01 March 2012

Banding/parameter selection		
1	How and why were the boundaries for types A, B, C and D selected? They look more onerous than other EU zones. How and why were the GB zone specific parameters selected in the RfG?	Sizing was selected based on the size of synchronous area by the Drafting Team in order to produce proportional and fair obligations. GB corresponds broadly to similar sized areas. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
2	Has “significant” been interpreted correctly?	NGET and ENTSOE believe it has, ACER has indicated no concerns with this, to date. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
3	Band boundaries can be lowered on a national basis so why weren't the GB bands set at current levels so they can be reviewed and lowered as appropriate to the proposed levels?	The distinction between “power generation facility” (GB power station equivalent) and “generating unit” (GB BMU equivalent) is important in that it means direct comparison between existing and future potential obligations are not relevant. The Drafting Team has proposed that band boundaries can be applied to smaller generators than a defined maximum but it was felt that these maximums were required to ensure a fair and effective assignment of minimal network support from all generators. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remains
4	Type A/B boundaries require for there to be an appropriate regime in place to certify mass market products but this is currently not the case.	NGET agrees with statement. Ideas are invited to encourage such a regime to be developed. This is currently under review in ENTSOE and therefore stakeholder feedback on this would be beneficial. Item closed – GB stakeholders invited to respond to ENTSOE
5	Definitions for Generating Unit is ambiguous	Feedback was taken on board prior to the 24 th January consultation being published – and definition amended, in line with previous comments. Some parties still felt that ambiguity remains. Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remains
6	Band C and D boundaries move the current LEEMPS obligations down to 10MW	See item 3. In addition, National Grid confirmed that the proposals could result in result in certain new 10MW BMUs from being subject to obligations similar to current LEEMPS generators but it should also be noted that other sized new generators would be subject to less onerous obligations. Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remains
7	The application of additional reactive and stability obligations on >10MW generates (i.e. non-synchronous) will add cost to generators and DNOs	See item 3. The requirement for this is based on facilitating ongoing security of supply faced with a growing amount of embedded generation. Additional information is provided in M&A 2.4 and FAQs 7 and 22. Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remain
8	Which parameters/obligations change/will not	See item 11.

	change/may change?	Item Open
9	What is the formal governance process for the setting of TSO parameters within RfG ranges?	NGET is committed to normal GB governance to implement any resulting changes within GB codes. Whilst it is assumed that the GCRP will be the main Panel involved it was also recognised that other Panels such as the DCRP or STC Committee may also be involved. Item closed
10	Criteria for selection of type of boundary to be in RfG?	EU law states what and not why, the rationale (and criteria) is included within the FAQ and M&A document. Item closed – GB stakeholder invited to respond to ENTSOE if further concerns remains
RfG Implementation		
11	What will the impact be of RfG on the Grid Code (GC) and other GB Codes?	NG has prepared a comparison with the GC obligations, and the DNO community via Mike Kay has prepared a similar version against D Code. The group acknowledged this material was useful, however further work is required to highlight where changes will be required (a traffic light system) Item open Action – sub group to be established to traffic light the change requirements (indicating where obligations would change as a result of the Network Code). This should consist of NGET and members of the JESG, type A & B generator representation also to be invited (HHIC and Micropower Council identified as possible contacts). Action to be undertaken following completion of the RfG consultation period. Action – a word version of the current comparison document to be circulated (this will first be extended to ensure all “new” requirements are also captured).
13	How will GC compliance be demonstrated?	Compliance arrangements within the RfG are based on GB arrangements for large units (A10 currently with Ofgem for approval). The meeting agreed that the arrangements for types C, B and A feel unnecessarily bureaucratic, which stakeholders were invited to feedback in their consultation responses. Item closed – GB stakeholders invited to respond to ENTSOE
14	When will RfG obligation apply to new generators?	RfG will apply 3 years after comitology completes. All generators with binding contracts before this time will not be classified as new. Further information can be found in M&A section 3. The meeting requested a timeline setting out the process on when requirements would apply to new generators Issue Open - Action – NGET to prepare and circulate timeline clarification
Justification		

15	Is NGET going to produce a GB specific justification document?	No. ENTSOE considers the FAQ and M&A document as laying out the justification Issue Open - Action – NGET to feedback to ENTSOE that it would be useful to allow stakeholders to comment on the FAQ and M&A.
16	Where is the CBA for FRT for Type B/C generators?	There is not one. Section 3.2 of M&A details ENTSOE view and explanation that a qualitative approach has been adopted. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
Retrospectivity		
17	What is the precise methodology for assessing whether retrospectivity is applied?	Decision by NRA on basis of TSO proposal, after public consultation (based on CBA). Detail provided in FAQ 11 Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
18	Can the authority unilaterally apply obligations retrospectively?	No Item closed
Style Drafting approach		
19	RfG drafting is not always clear	Any comments on drafting clarity are very much welcome as part of the Consultation Item closed - GB stakeholders invited to respond to ENTSOE
20	Recitals may require updating	This is one of the items that the ENTSO E legal resource group is in the process of considering Item closed
21	Methodology/ criteria for selection of Type boundaries should be included in RfG	It was agreed that it is not common practice to include the “whys” in European legislation (or GB Codes) but only the “whats” (as per item 10). Issue closed
Specific Technical Elements		
22	The parameters for the reactive power range may be too inflexible and should therefore be future proofed	Issue not discussed at Tech JESG but Slides describing NGET’s response have been posted on the JESG webpage: NGET does not fully understand concerns as it is believed that the proposed obligations provide greater flexibility than existing GB Codes. The NC code provides a permitted range which can be narrowed down by the GB Panels. Issue Open
23	Does the proposed drafting for Article 9 Paragraph 2(a)(1) of the RfG NC comply with the current GB obligations around Electronic Despatch Logging (EDL) in the Grid Code?	Issue not discussed at Tech JESG but Slides describing NGET’s response have been posted on the JESG webpage. Issue Open
24	Article 9 paragraph (b) concerns the provision of inertia and contains the wording “may be required” which is very open. However the decision whether Synthetic Inertia is required will be delegated to the	Issue not discussed at Tech JESG but Slides describing NGET’s response have been posted on the JESG webpage. Synthetic inertia is already being considered in GB and would be applied only on through a GB Panel decision this is unlikely to affect this process and the final decision. Issue Open

	national level.	
25	The upper voltage operating limit is currently 15 minutes in Grid Code but in the RfG it has been increased to 20 min	Following previous meeting, this issue was taken back to Drafting Team and the 15min limit has been accepted and included into the Network Code. Issue Closed
26	What were the assumptions behind the minimum Fault Ride Through (FRT) obligations for sub 132kV network?	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. There is no intent for any substantial changes, only to implement existing GB obligations in a more harmonised manner. Issue Open
27	What happens when there is a common/ shared Point of Connection e.g. Cruachan and Ffestiniog?	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. Issue has been taken back to DT and drafting has been amended so that in GB two such units can be treated as separate units. Issue Closed
28	The proposed rate of change of frequency withstand is 2 Hz/sec for 1.25s	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. Taken back to DT and drafting now reflects current GB practice. Time aspect removed. Issue Closed
29	Who will own the Dynamic System Monitoring (DSM) equipment? (Fault recorders)	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. No change envisaged for GB. Issue Closed
30	Auto-reclosure obligations have changed (8-2(a))	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. National Grid believes the latest consulted version may have resolved this issue? These specific obligations are subject to national choice. Issue Open
31	Fault Ride Through is now applied at the generator connexion point. In the current GB code it is defined at the interface between transmission and distribution. So this represents quite a change. Whilst this is a surprise, it might not be a bad thing in that it at least makes the requirements consistent for every DG connexion point. Some of it does look over specified – in effect the RfG is specifying the FRT for 11kV faults as well as supergrid faults.	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. It is not intended to make generators (including those embedded) responsible for transmission circuit faults. Issue Open
32	The code forces a formal EON; ION; FON process on us for all generation – ie energization notice, initial operation notice, final operation notice. This is	Issue not discussed at Tech JESG but Slides describing NGET's response have been posted on the JESG webpage. Issue Open

	the process NGET use for all transmission connected generators. It seems it needs to be applied right down to 400W inverters now. I'm sure we can tame the bureaucracy below 10MW, but we'll probably be stuck with some new process and admin to some degree.	
New Issues/ Questions		
33	Retrospective application – the 3 year review period for reconsidering retrospective application is a risk to ongoing project security	The FWGL directs this requirement. The meeting agreed that this continued to represent a risk. Item closed – GB stakeholders continue to consider this a risk, but within Network Code process this cannot be addressed
34	Retrospectivity and application to GB framework (a) definitions (with complications when compared with existing GB definitions) (b) general application of European Network Codes to GB framework	The meeting agreed that the implementation of new definitions could cause significant complications for implementation, including ensuring consistency across all European Network Codes. With regards to implementation of European Network Codes, the view from ENTSOE legal team is that European legislation cannot be directly replicated elsewhere (i.e. within GB codes). NGET lawyers are reviewing how European Network Codes might be implemented and will report back to the JESG. Action – NGET to report back view on implementation arrangements.
35	Is there sufficient justification of applying European Codes to GB Codes?	Justification of the RfG Network Code from ENTSOE was presented at the meeting. The meeting agreed that views were likely to differ on this statement and stakeholders should consider responding as they see fit. Item closed – GB stakeholders invited to respond to ENTSOE with any further comments
36	Are GB stakeholders consistent over the position with regards to Ireland? (Given that UK Government will be acting for Northern Ireland, and Ofgem representing the NI regulator)	The meeting noted that this was not within the vyries of the group, and should be logged for note only. Item closed
37	Who will provide notification to generators of what type they are? (A, B, C D)	The meeting noted that the onus on complying with legislation rests with the party on which the obligation is placed, and therefore it is not the responsibility of any other party to inform them. Item closed
38	The lack of type A and type B representation at the JESG meetings was questioned?	National Grid confirmed that attendance to these meetings is open to all and that invitation had been sent out to the usual broad distribution lists. It was felt that National Grid should have contacted extraordinary parties. Action – NGET to include review of stakeholder membership as a standing item on future JESG meetings. Contacts from HHIC and Micropower Council to be contacted by NGET for briefing on RfG in advance of the consultation period closing.
39	What is the proposed future mechanism for	It was confirmed that there is an ongoing initiative to develop a National registration mechanism

	Manufacturer/ Performance Data registration with TSOs?	for GB, perhaps on an accredited third party basis? This is also being considered by other Member States. Issue closed
40	"new requirements not in existing code e.g 92.91 - available power from PPMs"	Issue raised but not discussed Issue Open
41	Which takes priority over the Network Code, M&A and FAQ (for definitions)	A potential issue was raised that there were conflicting statements between the three documents. It was confirmed that only the Network Code had any legal force and ENTSOE are in the process of reviewing consistency. Issue Closed
42	Can we comment on FaQ and M&A documents during consultation?	Item open Action - As per item 15 NGET to feedback to ENTSOE that it would be useful to allow stakeholders to comment on the FAQ and M&A.
43	Where is the CBA for changes e.g. 16.3.C1 - Changed during drafting to introduce new requirements	Issue raised but not discussed Issue Open
44	Retrospective applications can be reassessed every three years - this poses a significant risk to new generation investments. Also will new derogations then only be granted on a three yearly basis?	Agreed as an issue - but process for retrospectivity is set out in Framework Guidelines. Issue closed
45	Fundamentally, where was it justified that generators connected to GB network, which is not synchronous with the continent's network, should have the vast majority of RfG obligations applied to them?	A proportion of members could not see how GB generators, especially smaller ones, can be of cross border significant to the continental network. Others felt that with increasing DC interconnection and with common mode failure mechanisms that this is not the case. Issue Closed - GB stakeholders invited to respond to ENTSOE
46	Definition for "Generating Unit" is similar to BMU rather than power station. This has been poorly understood and has a big impact.	The distinction between "power generation facility" (GB power station equivalent) and "generating unit" (GB BMU equivalent) is important in that it means direct comparison between existing and future potential obligations are not relevant. It was thought that there may be a risk of creating a back door implementation route for existing plant Issue Closed - GB stakeholders invited to respond to ENTSOE
47	Impact assessment - any IA measured against the cost of a "total Europe black out" is going to result in a positive outcome as the societal cost of a wide, total outcome is so massive	Agreed that this is one sided but also agreed that such a blackout is plausible and would be economically devastating Issue Open
48	Article 2 definitions e.g. control area derogations do	Issue raised but not discussed

	they work across other codes?	Issue Open
49	Commentary on justification FG 2.1. Final paragraph	Issue Open
50	Is it worth undertaking a GB Cost Collection/collation activity now? To aid any future CBA	No decision made at this time Issue Open
51	The DT claims that a data request for potential cost impact was ignored by generators but no generators present were aware of such a request	It was suggested that if ENTSOE showed Ofgem the data request made during the pilot stage of RfG drafting, this would allow greater confidence that a true quantitative Impact Assessment was indeed attempted by the DT. Issue Open Action – NGET to feed back to ENTSOE
52	OFGEM and DECC are representing GB and N. Ireland	Point noted Issue Closed