# NETS SQSS and Grid Code Industry Consultation Response Proforma

**GSR016 Small and Medium Embedded Generation Assumptions**

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 byDD MM YYYY to [box.SQSS@nationalgrid.com](mailto:box.SQSS@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

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| **Respondent:** | *Please insert your name and contact details (phone number or email address)* |
| **Company Name:** | *Please insert your Company Name* |
| **Do you agree that the current treatment of embedded Small Power Stations and embedded Medium Power Stations in the NETS SQSS under the security background conditions could lead to a transmission system that could unduly restrict this embedded generation from supplying the demand?**  **If not, please clarify why.** |  |
| **Do you agree that the current treatment of embedded Small Power Stations and embedded Medium Power Stations in the NETS SQSS under the economy and background conditions could lead to a transmission system that could lead to an investment that is neither economic nor efficient?**  **If not, please clarify why.** |  |
| **Are there any other issues that could arise due to the current methodology of accounting for embedded generation in investment planning studies?**  **If yes, please clarify what these are.** |  |
| **The Workgroup has based their conclusions on a set of assumptions (Paragraphs 4.20 to 4.30). Do you agree with these assumptions? If not, what would be the impact on the proposal?** |  |
| **Does the modification proposed mitigate the risks identified?**  **If not, please clarify where it fails to do so and how could these issues be addressed.** |  |
| **The data provided under the Grid Code is generally not sufficient to allow Transmission Licensees to meet the modifications proposed. The workgroup has identified an interim arrangement that could be used up until the Grid Code has been changed to allow the provision of the additional data. Do you agree with these arrangements? If not, please clarify the risks envisaged and the potential solutions.** |  |
| **Do you agree that the increasing percentage of generation that is not available for the System Operator to manage through the Balancing Mechanism constitute an operability risk and could result in the System Operator being unable to meet the operational criteria stipulated in the NETS SQSS?**  **If no, please clarify the reasons.** |  |
| **Do you agree that the NETS SQSS, in its current state, places a requirement on Transmission Licensees to ensure that the network is operable at all times? If not, please clarify the reasons.** |  |
| **Do you agree to the potential interim solutions that the workgroup has identified to allow the operability criteria of the NETS SQSS to be met?**  **If not, please clarify the reasons and the alternatives.** |  |
| **Do you agree to the enduring solution to the operability risks identified by the workgroup would require a wider change to the commercial framework?**  **If not, please clarify the reasons and the alternatives.** |  |
| **Do you believe that GSR016 better facilitates the appropriate NETS SQSS objectives?** | *For reference the applicable NETS SQSS objectives are:*  *(i) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;*  *(ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;*  *(iii) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and*  *(iv) facilitate electricity Transmission Licensees to comply with their obligations under EU law.* |
| **Do you generally support the modifications proposed by the workgroup? If not, please clarify your concerns.** |  |
| **Are there any further technical considerations that need to be taken into account?** |  |
| **Please provide any other comments you feel are relevant to the proposed changes.** |  |