

GC0102 EU Connection Codes GB Implementation – Mod 3

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 by **5pm on Thursday 9th November 2017** to grid.code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be forwarded to grid.code@nationalgrid.com with subject clearly stating 'GC0102 Consultation Query'

Respondent:	<i>Sridhar Sahukari</i>
Company Name:	<i>Orsted (formerly DONG Energy)</i>
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity ii. To facilitate 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) iii. 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 iv. 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 v. To promote efficiency in the implementation and administration of the Grid Code arrangements

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0102	Yes. We agree that GC0102 Original proposal

	Original Proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	facilitates the Grid Code Objectives.
2	Do you support the proposed implementation approach?	Yes.
3	Do you have any other comments?	Section 4.1.7 mentions that Article 15(4) in RfG is covered by CC.6.3.10 and CC.6.3.15. However, Article 15(4)(c) is not covered.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No.

Specific GC0102 Consultation Questions

Q	Question	Response
5	Do you have any comments on the structure of the proposed relationship between the D Code, G59 and G83, and G98 and G99? In particular which of the three options in Section 3.2 of this consultation do you support and why?	
6	Do you agree with the organization of G99 and how it applies to the different Types of generation? Do you have any alternative suggestions for structure?	
7	Do you agree with the current view of how the Grid and Distribution Codes (and G98 and G99) will be applied to installations where new PGMs are installed alongside existing pre-RfG equipment? (see page 11)	Yes, we agree with the way RfG clauses will co-exist in the Grid Code.
8	Do you agree on the introduction of a Preliminary Operation Notification relating to the Compliance process	

	for Transmission connected Type B and Type C PGMs? (See <i>Workgroup discussions section</i>)	
9	Do you agree with the retaining of the current GB arrangements for automatic connection and reconnection and the logic for it? If not, what alternative should be proposed? (see section 4.1.2.2)	
10	Do you consider any parts of the proposed compliance, simulation or testing requirements for distribution-connected generators to be disproportionately onerous? (See section 5.2.5)	We believe there is no requirement for Preliminary Frequency Testing (ECP.A.6.6.4) as per RfG. We believe this is onerous on the developers, as there is high dependency on weather conditions to perform this test.
11	Do you agree it is appropriate to drop the designation Large and Small from the Distribution Code as proposed in section 3.3.1 of this consultation? Do you believe it is appropriate to drop the designation Large, Medium and Small from the Grid Code?	Yes, we agree to drop the designation Large, Medium and Small from the Grid Code with regard to technical requirements.
12	Do you have any comments on the draft requirements for fault recording equipment for distribution-connected Type C PGMs as drafted in Section 13.11 and Appendix C3 of G99?	
13	Do you agree that it is appropriate to include storage in G98 and G99, noting that as storage is explicitly excluded from the RfG, the technical requirements that arise solely from the RfG are not applied to storage in G09 and G99?	
14	Do you agree that it is appropriate to include Type A PGMs <800W in capacity in G99, noting that those technical requirements that emanate from the RfG are not applied to PGMs <800W?	
15	If you do not consider the proposed	We agree that the requirements are harmonised

	<p>solution to sufficiently harmonise the connection requirements for new parties connecting to the transmission and distribution networks, how would you propose this to be addressed? (See <i>Workgroup discussions section</i>)</p>	<p>as best as possible with the Proposer's solution. We are not in favour of publishing all the Bilateral Connection Agreements in the public domain due to the commercial sensitivity and confidentiality reasons. However, at the same time we propose that the existing templates for BCA, ConsAg and other appendices to be improved to increase the transparency. Similarly, if any generator is required to meet additional requirement than what is mentioned in the template, NGET shall provide all the required evidence for the addition.</p>
16	<p>G98 and G99 include specific requirements for power quality, harmonic compliance etc. Do you believe it should be possible to use other international standards or requirements to achieve these ends such that these specific requirements can be dropped from these documents? An explanation of your views would be useful.</p>	
17	<p>Do you agree that the explanation of type testing, both full and partial, and the inclusion of equipment certificates, is sufficiently clear and unambiguous in G99 drafting? Please make any suggestions that could add clarity.</p>	
18	<p>The application of new technical requirements to non-type tested generation connecting to distribution networks will give rise to new processes etc. Please comment on how comprehensive the coverage of this is in the current drafting of G99 and please suggest any improvements</p>	
19	<p>Do you have any views on how the data and information required and articulated within G99 can or should relate to the Distribution Data Registration Code in the Distribution Code?</p>	
20	<p>Do you believe that this modification helps to promote transparency across the Industry and if not which areas should be improved? (see <i>Workgroup discussions section</i>)</p>	

Legal drafting questions

Q	Question	Response
21	The Proposed draft Grid Code legal text contains a number of comments incorporating both internal and workgroup comments. Please feel free to provide further comment on the documents (Annex 1-5)	<p>In the App 3 -> ECP.6.6.1 (pg 15), it is not clear if 24months period starts from issue of ION-A or ION-B especially in the case of Offshore PPMs. As discussed in the workgroup meetings, load rejection drafting needs to be improved to make it clearer on what is expected of the studies.</p> <p>We believe there is no requirement for Preliminary Frequency Testing (ECP.A.6.6.4) as per RfG. We believe this is onerous on the developers to be able to do this due to high dependency on weather conditions.</p>
22	Do you have any views on the structure of the Grid Code drafting for System Management and Compliance? (Annex 1-5)	
23	Are there are any areas in the Grid Code or Distribution Code drafting which you do not believe reflect the requirements of the RfG or HVDC Codes and, if so, why do you believe they are deficient? (Annex 1-9)	
24	Please make any other comments on the legal text drafting for the Distribution Code, G98 and G99 using the appropriate templates issued with this consultation.	