

Workgroup Consultation Response Proforma

GC0151: Fault Ride through process

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 16 August 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

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:	Alan Currie
Company name:	Ventient Energy
Email address:	Alan.currie@ventientenergy.com
Phone number:	+44(0) 7798770564

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

Standard Workgroup Consultation questions		
1	Do you believe that the GC0151 Original Proposal better facilitates the Applicable Grid Code Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Specific GC0151 Workgroup Consultation questions		
5	Do you have any comments on the Process to be followed after a suspected fault ride through failure?	<p>We fully agree that the process followed should be clear for all parties involved and follow legal requirements to protect both users and consumers. We fully support the proposal which we believe best delivers this situation.</p> <p>We would however like to see better definition of compliance evidence post failure resolution, what evidence will be required to prove compliance.</p>
6	Do you have any comments on the required sharing by the ESO of largest infeed loss information?	None.
7	Do you have any comments on the sharing of user lessons learned information (including any information from Fault Data/Recorders)?	None.
8	Do you have any comments on the sharing of information	None.

	by the ESO on faults (with or without identified FRT issues)?	
9	The proposal sets out the time to investigate by the User et al. Do you believe this time is appropriate or not? Please provide your rationale	We agree the proposal best outlines a suitable timeframe for investigation and then if required resolve issues, we would however like to see extensions be made available for the procurement of equipment that will be needed to resolve any identified fault, for example we currently see a 3 month delivery time for protection relays. Timeframes in the initial proposal and alternative are unrealistic given the complexity of the fault analysis required and remote location of plant. We also agree that further information should be provided by the ESO at the point of a grid trip which will better assist in fault investigations.
10	The proposal sets out the MW threshold. Do you believe this is appropriate or not? Please provide your rationale	We do agree that the 100MW threshold is appropriate. As the FRT requirements apply to all large generators which differs across the GB network, a simple clear threshold of 100MW best defines sites that will have a significant impact on the system in the event of a FRT trip.
11	The proposal sets out the level of the forced constraint. Do you believe this is appropriate or not? Please provide your rationale	We agree with the proposal and outlined arguments where grid stability, user and consumer should all be protected in the best possible way through an FRT event and investigation. We agree that the degree of forced constraint being the lowest of 70% of the TEC or largest infeed limit protects all stakeholders.
12	Do you believe that the methodology should apply differently to projects in receipt of an ION or a FON?	None
13	Should the ESO have the ability to constrain a User suspected of FRT failure ahead of further investigation?	NO – Innocent until proven guilty should be the clear memorandum. Users could be faced with significant financial penalties in a wrong assumption taken by the ESO.
14	In respect of the voltage wave form data, should the Grid Code prescribe or not the format in which that data is to be provided? Please provide your rationale.	None.

15	In respect of the constraint limitation to be applied to affected parties, should this be set within a range or a fixed value? If so, what do you believe that to be. Please provide your rationale.	See Q10.
16	Would you agree that a generator should continue to operate if there was a derogation required?	None.
17	Do you believe that generators operational history should be taken into account when deciding upon the constraint level whilst an investigation is taking place?	No – subjective.
18	Do you have any comments on possible Alternative from the ESO as included in the consultation?	We believe that the proposal provides a better solution that provides a realistic timeframe for actions and best protects all stakeholders.
19	Do you have any comments on the Strawman document on the FRT process?	None.

Legal Text