

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:	Tim Ellingham
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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?	The additional clarity and the removal of outside Grid Code processes/guidance does facilitate the Grid Code better.
2	Do you support the proposed implementation approach?	We support the majority of the modification though we question the pre-determined constrained MW levels.
3	Do you have any other comments?	Any additional text to either CC or ECC 6.3.15 needs to be checked that it is not introducing more onerous conditions than the current text, for example p13 of the modification gives an example of protections settings which appear more onerous than the 6.3.15 requirement, we are aware these figures are for illustration.
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?	We understand the need for the process and are more comfortable with it being within the code as opposed to outside of it.
6	Do you have any comments on the required sharing by the ESO of largest infeed loss information?	The information may prove useful for operational matters.
7	Do you have any comments on the sharing of user lessons learned information (including any information from Fault Data/Recorders)?	Although this info may call in to question some confidentiality concerns, it is ultimately to the benefit of the greater good. Many real life FRT issues are completely removed from those elements that are modelled for FRT compliance. Often these FRT failures can only be found through experience, so sharing of such experience is essential for the stability of the power system and the benefit of the country.

8	Do you have any comments on the sharing of information by the ESO on faults (with or without identified FRT issues)?	In order to establish causality and sequence of events, fault data from the ESO is vital.
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 feel the time proposed to be adequate for most locations save for the largest windfarms, with possibly hundreds of turbines, where download of data can take a long time and require OEM assistance. A option to extend, bilaterally, in such cases could be beneficial.
10	The proposal sets out the MW threshold. Do you believe this is appropriate or not? Please provide your rationale	We believe this is appropriate as it removes complications relating to medium power stations.
11	The proposal sets out the level of the forced constraint. Do you believe this is appropriate or not? Please provide your rationale	We understand the intent of a set level but we would like to see some justification for the chosen level.
12	Do you believe that the methodology should apply differently to projects in receipt of an ION or a FON?	We also understand the intent to separate out the two notification levels but it may, ultimately, be to no benefit. Considering the level of preparation required to reach an ION with respect to FRT, there is possibly no valid reason to discriminate more than an User with a FON.
13	Should the ESO have the ability to constrain a User suspected of FRT failure ahead of further investigation?	The ESO should not constrain until they have sufficient evidence. The burden of proof should be on the ESO under such attempts.
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.	The data is only likely to take a few formats, the format should be either what helps the User most or as default, the most basic form e.g. .csv time/voltage.

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.	A range with a defined maximum may be a better solution, which can be correlated with a perceived risk/impact on the system.
16	Would you agree that a generator should continue to operate if there was a derogation required?	Operation whilst in application for a derogation is per the existing CP, that operation should be accordance with the prevailing LON.
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?	We feel operational history can be considered, but in relation to the negative, if a plant has had previous issues, with respect to FRT, then this should have some influence on restricting the running. If a plant has had no previous issues then this shouldn't produce an opposite result of no constraint, i.e. no previous history shouldn't be taken as being firm evidence that a site is fully capable of FRT more, the site has not been exposed, therefore is an unknown quantity.
18	Do you have any comments on possible Alternative from the ESO as included in the consultation?	We do not support the alternative.
19	Do you have any comments on the Strawman document on the FRT process?	We welcome the strawman document for clarity but there will be much work required to make it fully fit for purpose.

Legal Text