

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:	Graeme Vincent
Company name:	SP Energy Networks
Email address:	graeme.vincent@spenergynetworks.co.uk
Phone number:	07753 622336

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?	Without seeing the formal proposed legal text it is not possible to gauge the impact that this modification may have on parties including any impacts on network operators and transmission owners. We do acknowledge that a general outline is provided, however, it is the legal text which gives effect to this and therefore identifies the exact obligations and requirements being placed on each party.
2	Do you support the proposed implementation approach?	
3	Do you have any other comments?	<p>Given that under the current governance arrangements it is difficult to make substantive changes post-work group consultation without the GCRP referring back to the workgroup for consideration, it would have been better for the proposed legal text to have been presented at this stage in the process to allow stakeholders sufficient time to assess and understand whether the proposed changes apply to them and therefore what the implications may be.</p> <p>Due to the lack of clarity on the exact proposals of the modification we have not responded to the detailed questions posed below.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No, greater clarity on the existing proposal and its impacts is required.
Specific GC0151 Workgroup Consultation questions		
5	Do you have any comments on the Process to be followed after a suspected fault ride through failure?	
6	Do you have any comments on the required sharing by the	

	ESO of largest infeed loss information?	
7	Do you have any comments on the sharing of user lessons learned information (including any information from Fault Data/Recorders)?	
8	Do you have any comments on the sharing of information 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	
10	The proposal sets out the MW threshold. Do you believe this is appropriate or not? Please provide your rationale	
11	The proposal sets out the level of the forced constraint. Do you believe this is appropriate or not? Please provide your rationale	
12	Do you believe that the methodology should apply differently to projects in receipt of an ION or a FON?	
13	Should the ESO have the ability to constrain a User suspected of FRT failure ahead of further investigation?	

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.	
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.	
16	Would you agree that a generator should continue to operate if there was a derogation required?	
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?	
18	Do you have any comments on possible Alternative from the ESO as included in the consultation?	
19	Do you have any comments on the Strawman document on the FRT process?	
Legal Text		