

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:	Christopher Smith
Company name:	National Grid Interconnectors (IFA) and national Grid Interconnector Holdings (IFA2)
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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?	Yes it is better than the existing grid code (baseline) and the interim ESO process.
2	Do you support the proposed implementation approach?	Yes it requires USERS to investigate trips to ensure that the system is not being put at risk. However, unlike the interim ESO process, the timescales are reasonable and achievable
3	Do you have any other comments?	No
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Not at present. However, as discussions progress workgroup attendees may raise alternatives
Specific GC0151 Workgroup Consultation questions		
5	Do you have any comments on the Process to be followed after a suspected fault ride through failure?	No comments
6	Do you have any comments on the required sharing by the ESO of largest infeed loss information?	Yes this is important for any fault investigation as it has an impact on how the system will behave.
7	Do you have any comments on the sharing of user lessons learned information (including any information from Fault Data/Recorders)?	We are supportive of the majority view that only broad lessons learnt should be shared
8	Do you have any comments on the sharing of information by the ESO on faults (with or without identified FRT issues)?	It would seem sensible that the ESO provide greater information to permit Users to assess their own plant's FRT performance.

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	12 weeks would seem appropriate
10	The proposal sets out the MW threshold. Do you believe this is appropriate or not? Please provide your rationale	100MW seems appropriate
11	The proposal sets out the level of the forced constraint. Do you believe this is appropriate or not? Please provide your rationale	70% of TEC, or largest infeed loss appear to be appropriate
12	Do you believe that the methodology should apply differently to projects in receipt of an ION or a FON?	<p>It is not clear what scenarios would lead to a difference. FRT is a requirement for ION therefore it is incorrect to assume that any plant with an ION are at a heightened risk of being non-compliant with the FRT requirements in the Grid Code.</p> <p>A more sensible approach might be to align ION with the proposed treatment of a LON. That is to say if the remaining outstanding compliance issues for the ION include items that can reasonably be expected to impair on the plant's FRT performance so the restricted output requirement applies. However if it does not then no such restriction should apply.</p>
13	Should the ESO have the ability to constrain a User suspected of FRT failure ahead of further investigation?	No
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.	Yes. It will allow for quicker solutions if data is presented in an agreed format

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 answer to question 11. A fixed limit would avoid confusion
16	Would you agree that a generator should continue to operate if there was a derogation required?	yes
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. past performance does not necessarily indicate future performance.
18	Do you have any comments on possible Alternative from the ESO as included in the consultation?	The process is not feasible. To undertake such detailed technical investigations within 2 hours of the trip.
19	Do you have any comments on the Strawman document on the FRT process?	No.

Legal Text