

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:	Paraic Higgins
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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, transparency and clarity on the process is needed considering the consequences for the ESO, customer and grid code parties required to be FRT compliant. The proposed modification reduces the concerns with security of supply and potential costs to the consumer in that any prudent operator would only bring such a unit back online if it was able to be FRT compliant. The current ESO proposal places a timeframe burden on a party which could far outweigh the benefits.
2	Do you support the proposed implementation approach?	No comment.
3	Do you have any other comments?	No comment.
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?	The proposed process provides welcome clarity on the requirements/obligations all parties should follow in the event of a Fault Ride Through scenario. ESB believes that such clarity provides grid code parties with the necessary protection from REMIT allegations of with-holding a plant.
6	Do you have any comments on the required sharing by the ESO of largest infeed loss information?	ESB supports the publication of the largest infeed loss information. As identified in the workgroup, this information is already published and should continue to be published in the most easily accessible and user-friendly manner.
7	Do you have any comments on the sharing of user lessons learned information (including any information from Fault Data/Recorders)?	ESB supports the sharing of user lessons learned information (confidential elements removed). Such an approach will assist all market participants in improving their understanding of the issues and possible mitigation solutions.

8	Do you have any comments on the sharing of information by the ESO on faults (with or without identified FRT issues)?	ESB supports the sharing of information by the ESO on faults (confidential elements removed). Such information is vital to improving our understanding of the issues and possible mitigation solutions.
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	ESB acknowledges; (1) in line with Grid Code OC10.4.1.4, a User will have 2 hours to respond with a preliminary report into the loss of output and (2) that some Users connected to the NETS have a requirement to install monitoring equipment (CC.6.6.1 and ECC.6.6.1) which provides them with Voltage (V), Active Power (MW), Reactive Power (MVar), and Frequency signals. However, as mentioned in the proposal recent events highlighted by the ESO had identified that an FRT event in one part of GB could manifest itself some 250 miles / 400 kms away. Information of this kind could be important to relevant stakeholders to assess the situation with their plant. The increase time, as per this modification, will allow prudent operators to investigate without being disadvantaged from a lack of information.
10	The proposal sets out the MW threshold. Do you believe this is appropriate or not? Please provide your rationale	No comment.
11	The proposal sets out the level of the forced constraint. Do you believe this is appropriate or not? Please provide your rationale	No comment.
12	Do you believe that the methodology should apply differently to projects in receipt of an ION or a FON?	Considering the potential requirements/testing to move from an ION to a FON, it may be prudent to have some difference in treatment of 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?	ESB support the ESO in its role and their expertise and knowledge in such issues but for the ESO to be able to constrain a User suspected of FRT failure (outside of levels and obligations defined in the grid code) ahead of further investigation there would need to be sufficient evidence to support the ESO's

		position. That said we do recognise that the ESO could trigger the LON process regardless.
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 format would need to be in a form where all parties can access without needing a costly proprietary software.
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?	A LON should address this.
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?	A plant could have been “lucky” all these years that they had not been operating when a fault occurred on the system to cause a problem. If there is a fault and the generator does not perform as expected/required then operational history doesn’t really matter – it is what the generators are capable of doing at the present.
18	Do you have any comments on possible Alternative from the ESO as included in the consultation?	No comment.
19	Do you have any comments on the Strawman document on the FRT process?	No comment.
Legal Text		

