

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
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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?	In general, yes. On technical grounds it is debatable if the original proposal supports an increased level of security of supply. We support the approach to share data about system faults and to clarify the FRT requirement text in the Grid Code. We do not support the proposed process for a response in the event of a trip or de-load coincident with a system fault.
2	Do you support the proposed implementation approach?	The timescales are appropriate.
3	Do you have any other comments?	None.
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 original proposal sets out different responses based on asset rating and level of operational notification. It is not clear that these distinctions are relevant to FRT compliance and system security.
6	Do you have any comments on the required sharing by the ESO of largest infeed loss information?	In general data sharing by the ESO supports efficient markets. The largest infeed loss is published by the ESO.
7	Do you have any comments on the sharing of user lessons learned information (including any information from Fault Data/Recorders)?	The sharing of lessons learned information should be encouraged. It is recognised that there may be occasions when full data sharing isn't possible for commercial or IP reasons.
8	Do you have any comments on the sharing of information by the ESO on faults	The sharing of fault data information should be encouraged. It is recognised that there may be occasions when full data sharing isn't possible for commercial or IP reasons.

	(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	The original proposal suggests 12 weeks to investigate a potential FRT non-compliance. This seems too long, particularly in the context of system security. Most investigations in to incidents which don't have straightforward explanations would be completed in 2-3 weeks.
10	The proposal sets out the MW threshold. Do you believe this is appropriate or not? Please provide your rationale	We don't believe that the MW threshold is appropriate in relation to potential FRT non compliance incidents. The ESO needs to manage system security against the largest infeed loss, not the largest infeed loss plus an uncertain capacity which may not be FRT compliant, regardless of the unit MW rating.
11	The proposal sets out the level of the forced constraint. Do you believe this is appropriate or not? Please provide your rationale	It was not clear that the level of forced constraint proposed would make a unit that appeared to be FRT non-compliant more stable for all technology types. Consequently a defined level of constraint does not appear appropriate.
12	Do you believe that the methodology should apply differently to projects in receipt of an ION or a FON?	Discussions suggest that being in receipt of an ION or FON made no difference with respect to being potentially FRT non-compliant. No additional testing of FRT takes place before a FON is issued, therefore whether a project holds an ION or a FON should not be used as a differentiator for treatment after a potential FRT non-compliance event.
13	Should the ESO have the ability to constrain a User suspected of FRT failure ahead of further investigation?	This should not be imposed unilaterally. The ESO should discuss the specifics of the event with the user and agree any degree of constraint for the duration of the 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.	As the format of data and software evolves over time it would seem inappropriate to prescribe the data format in the Grid Code.
15	In respect of the constraint limitation to be applied to affected parties, should this be	We are not persuaded that it's appropriate to set a range. The degree of constraint should be agreed between the ESO and the user taking into account the specific details of the plant and the event.

	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?	Having identified the nature of derogation required the generator should continue to operate in a way agreed between the ESO and the generator until the derogation is approved.
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?	The degree of constraint should be agreed between the ESO and the user taking into account the specific details of the plant, including operational history, and the event.
18	Do you have any comments on possible Alternative from the ESO as included in the consultation?	<p>The ESO alternative includes the data sharing and lessons learned elements of the original proposal and this is welcomed.</p> <p>In general the ESO alternative better addresses the issues associated with suspected FRT non-compliance identified in the 7th May letter.</p> <p>The ESO alternative seeks to agree with the user any constraints and timeframes for any investigation into suspected FRT non-compliance events. This is appropriate.</p> <p>Beyond this principle of agreement with the user the ESO should also recognise that in many cases the user will not be able to explain events in 2 hours. The existing communication at the operational interface between control centre and operator will take place in that timeframe but available expertise, information and explanation is often limited. Some events will have straightforward explanations which can be shared in 24 hours. More complex events can take 2-3 weeks to investigate and explain.</p>
19	Do you have any comments on the	The Strawman adds welcome clarification to the existing Grid Code text.

	Strawman document on the FRT process?	
Legal Text		