

Code Administrator Consultation Response Proforma**GC0137: Minimum Specification Required for Provision of GB Grid Forming (GBGF) Capability (formerly Virtual Synchronous Machine/VSM Capability)**

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 04 October 2021**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Kavita Patel Kavita.patel@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Antony Johnson
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I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable Grid Code Objectives are:

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- To promote efficiency in the implementation and administration of the Grid Code arrangements*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions		
1	Do you believe that the GC0137 Original Proposal better facilitates the Applicable Objectives?	Yes – We believe this modification is essential in facilitating the operation of a low carbon transmission system in a safe, secure and economic manner and in this respect particularly facilitates Grid Code objectives a), b) and c).
2	Do you support the proposed implementation approach?	Yes – especially as the proposal is non-mandatory which would promote the use of market based arrangements. We believe this is the best way of maintaining System Security using a range of low carbon technologies in the most economic manner.
3	Do you have any other comments?	We have worked with many stakeholders as part of this modification and would note the extensive research they have undertaken in demonstrating the capability and viability of this technology, in addition to the contribution they have made to the proposed solution. We would add this is fundamental to ensuring safe and secure system operation whilst contributing to minimising Transmission system operating cost in a low carbon environment. As such we agree that the modification has followed due process and discharged the requirements of the Terms of Reference.