

Response to NETS SQSS Review Consultation	
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Contact Details	alan.creighton@northernpowergrid.com
Q1. Please provide your comments/feedback and suggestions related to the topics raised in Section 3.1 Offshore Transmission System.	
<p>We agree that it is appropriate to review the security standard for the off-shore transmission system given the significant development of such systems in recent years and their anticipated growth expected in the future.</p>	
Q2. Please provide your comments/feedback and suggestions related to the topics raised in Section 3.2 Demand Connection Criteria.	
<p>We agree that a harmonised system design approach for distribution and transmission systems, particularly at Grid Supply Point substations, is essential and that this should facilitate the transition to net-zero. The consultation document identifies three areas where there are differences in the current security design standards, and we agree that these aspects should be reviewed. In addition there would be merit in considering:</p> <ul style="list-style-type: none"> • How to take account of the security contribution from DNO contracted and non-contracted Demand Side Response as well as embedded generation. • How to take account of the security contribution from clusters of embedded generators, in addition to that from individual generators. • The application of the security standards where there are DNO Active Network Management schemes that constrain demand and/or export. • The application of the security standards where there connection agreement with individual DNO customers that constrain demand and/or export. • Whether there may be a need to update the Grid Code if there is a need to revise the data exchanged between NGESO and DNOs e.g. as part of the Week 24 submission. 	
Q3. Please provide your comments/feedback and suggestions related to the topics raised in Section 3.3 Generation Connection Requirements.	
<p>There has been a significant increase in the number storage plants connected to our distribution system and we assume that there has been similar connection activity on the transmission system. Distribution connected storage has raised some challenges, not only related to the import and export from such plant, but also arising from the range of their operating patterns. Whilst most distribution storage is connected via single circuit security, so there is no direct comparison with the requirements of NETS SQSS Section 2, we think that there would be merit in having a harmonised approach to the operational patterns for this type of new technology that should be used during the connection design process, for example when assessing step voltage changes.</p>	
Q4. Please provide your comments/feedback and suggestions related to the topics raised in Section 3.4 Main Interconnected Transmission System (MITS).	
<p>We agree that it is appropriate to review the security standard for the MITS, and agree that the items raised in the consultation should be considered. We are of the view that this review should consider embedded generation as well as transmission connected generation.</p>	
Q5. Please provide your comments/feedback and suggestions related to the topics raised in Section 3.5 Operational Standards in England and Wales.	

We agree that an assessment of the relaxing the security standard from N-D to N-1 may have an adverse impact on the security of supply to customers, and this aspect should be specifically considered in the proposed review.

Q6. Please provide your comments/feedback and suggestions related to the topics raised in Sections 3.6 Introduction of CATO.

We have no comments on this aspect of the consultation.

Q7. Please provide your comments/feedback and suggestions related to the topics raised in Sections 3.7 Governance.

We agree that the present governance arrangement that requires a specific licence change to implement a SQSS change introduces an extra step that is perhaps unnecessary. It may be possible to adopt the approach for EREC P2/7 where the drafting of the Standard Distribution Licence Conditions means that subsequent versions of EREC P2, as approved by Ofgem, can be implemented without a change to distribution licences.

Q8. Which of the proposed modifications will have the most significant impact on your operations/investment plan? To what extent would that impact be?

The review of the Demand Connection Conditions, in Section 3 of the NETS SQSS is likely to have the most significant impact on our operations as it may:

- Affect the connection requirements for demand, generation and storage.
- Affect the information exchange between DNOs and NGESO.

Q9. Are there any other areas that require review and may act as a barrier for net zero in NETS SQSS?

We have no other comments at this stage.

Q10. Do you agree with the priorities and the delivery timescales described in Section 4? If not, please provide additional information that could allow us to revise the priorities.

The priorities proposed seem reasonable. The consultation document mentions that the availability of industry resources may have a bearing on the pace with which the review can progress. We agree that this needs to be considered, as in our experience what may appear to be straightforward changes often involve detailed and nuanced analysis, hence we think that aligning SQSS with EREC P2/7 by October 2022 may be ambitious.

This consultation is available online here: [NETS SQSS Consultation](#)

Please return responses to box.SQSS.Review@nationalgrideso.com before 5pm on 9th March 2022.