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Workgroup Consultation Response Proforma

CM097: Electromagnetic Transient (EMT) and Root Mean Square (RMS) Model Submission for Transmission Owners (TOs)

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 stcteam@nationalenergyso.com by **5pm on 22 April 2025**. 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 stcteam@nationalenergyso.com

Respondent details	Please enter your details	
Respondent name:	Frank Kasibante	
Company name:	National Energy System Operator (NESO)	
Email address:	Frank.kasibante1@nationalenergyso.com	
Phone number:	07812774066	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)

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For reference the Applicable STC Objectives are:

- a) *efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989;*
- b) *efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989;*
- c) *development, maintenance, and operation of an efficient, economical, and coordinated system of electricity transmission;*
- d) *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity;*
- e) *protection of the security and quality of supply and safe operation of the National Electricity Transmission System insofar as it relates to interactions between Transmission Licensees and the licensee*;*
- f) *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC;*
- g) *facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System; and*
- h) *compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.*

* See Electricity System Operator Licence

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

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitate the Applicable Objectives versus the baseline?	<div>Mark the Objectives which you believe each solution better facilitates:</div> <div>Original <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input type="checkbox"/>D <input checked="" type="checkbox"/>E <input type="checkbox"/>F <input checked="" type="checkbox"/>G <input checked="" type="checkbox"/>H</div> <div>Click or tap here to enter text.</div>
2	Do you support the proposed implementation approach?	<div><input checked="" type="checkbox"/>Yes</div> <div><input type="checkbox"/>No</div> <div>Click or tap here to enter text.</div>
3	Do you have any other comments?	<div>More accurate models together with those provided by Users are essential and will overall enhance the modelling capability which will result in greater system optimisation and system security which will overall result in lower customer bills.</div>

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4	Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No Click or tap here to enter text.
5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.

Specific Workgroup Consultation questions

6	Please could you share your rationale for a cost-recovery mechanism to be put in place supported by evidence, where available. If no cost-recovery mechanism were available, what do you believe the implications would be?	We believe that there should be a cost recovery mechanism for TOs in respect of provision of EMT models for already connected equipment. For the established TOs the price control could be used for this purpose. However, for OFTOs it is unclear how the cost recovery mechanism would work. We do not believe it would be necessary for a cost recovery for new plant going forward. As CATOs are a new concept, we do not believe a cost recovery mechanism will be needed.
7	As part of the consequential modification for GC0168, it is proposed to prepare an Electrical Standard detailing how an EMT model would be submitted in PSCAD Version 5. Do you believe with appropriate signposting to the Grid Code from the STC, this would be an appropriate and cost-	Yes. We agree with this approach. PSCAD Version 5 or higher.

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	<p>effective method of providing this guidance to transmission licences. If you do not believe this to be the case, what alternative would you suggest and add the rationale for your view.</p>	
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