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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](mailto: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](mailto:stcteam@nationalenergyso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Mike Lee	
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<b>Phone number:</b>	07836 538270	
<b>Which best describes your organisation?</b>	<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 type="checkbox"/> System Operator <input checked="" 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?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <p>Original    <input type="checkbox"/>A   <input type="checkbox"/>B   <input type="checkbox"/>C   <input type="checkbox"/>D   <input checked="" type="checkbox"/>E   <input type="checkbox"/>F   <input checked="" type="checkbox"/>G   <input type="checkbox"/>H</p> <p><a href="#">Click or tap here to enter text.</a></p>
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/>Yes</p> <p><input checked="" type="checkbox"/>No</p> <p>The proposal has laudable aims; however, the implementation has not considered the implications on TOs, who the burden will fall on, in terms of resourcing or the specific need for the data. Specifically, our OFTO concerns are:-</p> <ol style="list-style-type: none"> <li>1. This data is unlikely to be available for most of our OFTO sites. (only more recent sites, e.g. post 2022, whereas older assets not).</li> </ol>

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		<p>2. We are reliant on manufacturers who may not have the data either (or may no longer exist) and commercial arrangements may be necessary to seek that data or further development work, at a cost.</p> <p>3. There is a significant time amount of internal time to progress this and can't all be done right now. It may take many months. There can't be an obligation to provide all of this by a specific date, there needs to be an agreed plan to deliver it. Resources diverted to this, cannot do other useful and potentially more important work.</p> <p>4. Is it necessary for every network? Especially the embedded OFTOs? It seems that the obligation should not be a blanket one but rather justified on the basis of need and cost. As there is no cost to NESO, there is no disincentive not to ask for everything.</p> <p>5. Through the OTSDUW process, NESO may well have a lot of this data already, and that should be first recourse.</p> <p>6. There will be a significant (internal &amp; external) cost, which the OFTO should be able to recover. The usual suggestion is that this is covered by the IAE term in each OFTO's licence. However, the threshold for each OFTO is high and is on an annual basis; as such the threshold will not be met. The OFTO's are concerned that many STC modifications such as CM085, cite this as a valid solution, but there is no assessment of cumulative impact. The OFTO regime was sold as a light touch TO model but given the complexity of the technical challenges faced by the industry, the OFTO's are being drawn into a much more involved role, which requires resources that the OFTOs were never funded for or expected to possess.</p> <p>This modification does not address that issue.</p>
3	Do you have any other comments?	No our concerns are outlined above.
4	Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?	<p><input checked="" type="checkbox"/> <b>Yes</b> (the request form can be found in the <a href="#">Workgroup Consultation</a> Section)</p> <p><input type="checkbox"/> <b>No</b></p> <p>The alternative process should be:</p> <ol style="list-style-type: none"> <li>1. require NESO to review the data available from the OTSDUW process for Offshore systems</li> <li>2. NESO to describe why a specific model versus generic models for each system is required</li> </ol>

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		<p>3. NESO provide a cost/time versus benefit assessment for each request for data to be provided</p> <p>4. Any requirement to provide data/models should be able to be completed progressively over a period of time (years), where the cost/benefit is shown to be positive</p> <p>5. NESO to establish a cost recovery mechanism for TOs to undertake such work (noting difference for TO/OFTO versus NESO's cost-pass through regulatory model)</p>
5	Does the draft legal text satisfy the intent of the modification?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

## 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?	<p>These changes are one of many being added to the requirements on transmission owners. The cumulative effect of many small changes, such as this, particularly on OFTOs is gradually impacting the belief that it is low-risk.</p> <p>Implementing this modification without funding will mean that the process will take longer and be less technically competent, if it is intended to deliver this without additional resource. There should be a cost-benefit of providing the data, an assumption by NESO that this comes at no cost will not result in the best decision for the whole industry, rather than focussing on the most value adding data required.</p>
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	<p>This is in line with a number of read across situations from STC to Grid Code. The only issue to bear in mind, is that the governance of the Grid Code is independent to the STC and there have been issues in the past with the GC panel making changes to GC documents which impact on the STC, without input from the STC community.</p>

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	<p>signposting to the Grid Code from the STC, this would be an appropriate and cost 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 rational for your view.</p>	
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