

Requirements for Generators – Technical Issues Summary

Topic area	#	Question
Banding/ parameter selection	1	How and why were the boundaries for Types A,B,C and D selected? They look more onerous than other EU zones. How and why were the GB zone specific parameters selected in the RfG?
	2	Has "significant" been interrupted correctly?
	3	Band boundaries can be lowered on a national basis so why weren't the GB bands set at current levels so they can be reviewed and lowered as appropriate to the proposed levels?
	4	Type A/B boundaries require for there to be an appropriate regime in place to certify mass market products but this is currently not the case.
	5	Definition for "Generating Unit" is ambitious
	6	Band C and D boundaries move the current LEEMPS obligations down to 10MW generators
	7	The application of additional reactive and stability obligations on >10MW generators (i.e. non-synchronous) will add cost to generators and DNOs
	8	Which parameters/ obligations "change", "will not change" and "may change"?
	9	What is the formal governance process for the setting of TSO parameters within RfG defined ranges?
RfG Implementation	1	What will be the impact of RfG on the Grid Code and the other codes?
	2	How will GC compliance be demonstrated,
	3	When will RfG obligation apply to new generators?
Justification	1	Is NGET going to produce a GB specific justification document?
	2	Where is the CBA for FRT for Type B/ Type C generators?
Retrospectivity	1	What is the precise methodology for assessing whether retrospectively is applied?
	2	Can the Authority unilaterally apply obligations retrospectively?
Specific Technical elements	1	The parameters for the reactive power range may be too inflexible and should therefore be future proofed
	2	Does the proposed drafting for Article 9 Paragraph 2(a)(1) of the RfG NC comply with the current GB obligations around Electronic Despatch Logging (EDL) in the Grid Code?
	3	Article 9 paragraph (b) concerns the provision of inertia and contains the wording "may be required" which is very open. However the decision whether Synthetic Inertia is required will be delegated to the national level.
	4	The upper voltage operating limit is currently 15 minutes in Grid Code but in the RfG it has been increased to 20 min
	5	What were the assumptions behind the minimum Fault Ride Through (FRT) obligations for sub 132kV network?
	6	What happens when there is a common/ shared Point of Connection e.g. Cruachan and Ffestiniog?
	7	The proposed rate of change of frequency withstand is 2 Hz/sec for 1.25s
	8	Who will own the Dynamic System Monitoring (DSM) equipment? (Fault recorders)
	9	Auto-reclosure obligations have changed (8-2(a))
	10	Fault Ride Through is now applied at the generator connexion point. In the current GB code it is defined at the interface between transmission and distribution. So this represents quite a change. Whilst this is a surprise, it might not be a bad thing in that it at least makes the requirements consistent for every DG connexion point. Some of it does look over specified – in effect the RfG is specifying the FRT for 11kV faults as well as supergrid faults.

	11	The code forces a formal EON; ION; FON process on us for all generation – ie energization notice, initial operation notice, final operation notice. This is the process NGET use for all transmission connected generators. It seems it needs to be applied right down to 400W inverters now. I'm sure we can tame the bureaucracy below 10MW, but we'll probably be stuck with some new process and admin to some degree.
	12	The offshore provisions do not seem to affect DNOs. Offshore is defined as having a connexion point offshore – which cannot be the case for DNOs in GB – so I think all that drafting only applies to transmission in GB.
Style/ Drafting Approach	1	RfG drafting is not clear
	2	Recitals may require updating
	3	Methodology/ criteria for selection for Type boundaries should be included in RfG