

## Requirements for Generators Issues Log v2

1	JESG	RfG – Current Grid Code obligations for GB generators vary on whether they are Small, Medium or Large. The RfG drafting has four categories; A,B,C and D. Is this graded approach appropriate?	Banding/ parameter selection
2	JESG	RfG - What is the GB governance process to be used when determining what criteria will be used to determine the various classes of Significant Grid Users (i.e. A,B,C or D)?	Banding/ parameter selection
8	JESG	RfG – A proportion of parameters and obligations that are currently in the Grid Code can remain the same if the current draft for the RfG NC was implemented. But which parameters would HAVE to be changed if the current draft was applied?	Banding/ parameter selection
9	JESG	RfG – The proposed frequency operating range for GB looks more onerous than those specified for the other synchronous zones. (page 14 of 24 Jan RfG draft)	Banding/ parameter selection
10	JESG	RfG – The minimum threshold to classify users as Type B Users in GB has been set at 1MW. What is the justification for this? (page 11 of 24 Jan RfG draft)	Banding/ parameter selection
24	Tech	The definition for “Generating Unit” is confusing – for both Synchronous and PPMs	Banding/ parameter selection
31	DNO	Arguably in this draft the requirements in GB the MW bandings have been made more onerous by the current banding, whilst they have relaxed for continental Europe. The formulation of the code allows the bands to be effectively lowered by the action of normal governance nationally – so GCRP/DCRP can move the applicability of the bands down on an as-needs basis. Based on this I believe there is a legitimate challenge to where these are set – particularly Bands C and D; ie they could be harmonized more with existing banding in GB, with the need for making it more onerous left for the future and when it is, by common consent, more appropriate.	Banding/ parameter selection
32	DNO	Bands A and B largely relate to frequency capability of mass market generation and are therefore seem sensible. However there does need to be an appropriate regime in place for certifying such mass market products – and I think the best we can say is that this is work in progress.	Banding/ parameter selection
33	DNO	Bands C & D are much more prescriptive and essentially, in specification and implications for both generators and DNOs, move the current LEEMPS requirements and approach down to 10MW.	Banding/ parameter selection
35	DNO	There are considerable reactive and stability requirements placed on generators above 10MW – particularly so for non-synchronous. This will fall as a cost on the generators... but also on DNOs in terms of compliance assessment – both at commissioning and ongoing.	Banding/ parameter selection

6	JESG	RfG – Some parameters within the NC can be set anywhere within a range, by each synchronous zone (i.e. Great Britain). How will the GB parameters be set under? And by who? (page 44 of 24 Jan RfG draft)	Banding/ parameter selection
25	Tech	Has the phrase “Significant” been correctly interpreted from the Framework Guidelines?	Banding/ parameter selection
19	Tech	What is the formal governance process for the setting of TSO parameters?	Banding/ parameter selection
5	JESG	RfG - How will it be possible to demonstrate that the Grid Code complies with the Network Code? Any flexibility may cause further debate	Implementation
16	JESG	RfG – how will the network code be integrated into the existing Grid Code?	Implementation
17	JESG	RfG – will there be a cut off date for the existing regime and new regime under the RfG Network Code?	Implementation
21	Tech	What is the impact going to be of the RfG on GB Codes other than the Grid Code/ Distribution Code? E.g. STC/ CUSC	Implementation
18	Tech	The RfG drafting team has prepared justification documents for the Network Code. Is National Grid intending to produce a GB specific justification?	Justification
23	Tech	If FRT obligations are going to applied to Type B and Type C generators where is the positive Cost Benefit Analysis?	Justification
4	JESG	RfG – The precise methodology for the Cost Benefit Analysis that will be used by GB to determine whether to apply European obligations retrospectively will not be set by the RfG Network Code.	Retrospectivity
14	JESG	RfG – Clarify whether the Authority can retrospectively apply a Cost Benefit Analysis	Retrospectivity
7	JESG	RfG - The parameters for the reactive power range may be too inflexible and should therefore be future proofed	Specific Technical element
11	JESG	RfG – 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?	Specific Technical element
12	JESG	RfG – 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.	Specific Technical element
20	Tech	The upper voltage operating limit is currently 15 minutes in Grid Code but in the RfG it has been increased to 20 min	Specific Technical element

22	Tech	What were the assumptions behind the minimum Fault Ride Through (FRT) obligations for sub 132kV network?	Specific Technical element
27	Tech	What happens when there is a common/ shared Point of Connection e.g. Cruachan and Ffestiniog?	Specific Technical element
28	Tech	The proposed rate of change of frequency withstand is 2 Hz/sec for 1.25s	Specific Technical element
29	Tech	Who will own the Dynamic System Monitoring (DSM) equipment? (Fault recorders)	Specific Technical element
30	Tech	Auto-reclosure obligations have changed (8-2(a))	Specific Technical element
34	DNO	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 overspecified – in effect the RfG is specifying the FRT for 11kV faults as well as supergrid faults.	Specific Technical element
36	DNO	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.	Specific Technical element
37	DNO	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.	Specific Technical element
13	JESG	RfG - The RfG Network Code in its current form is not as clear as it could be	Style/ Drafting Approach
15	JESG	RfG – some of the recitals in the consultation are inaccurate and may require updating	Style/ Drafting Approach
26	Tech	Some attendees questioned whether the methodology/ criteria for determining the boundaries between Types (e.g A,B,C,D) should be in the RfG Network Code	Style/ Drafting Approach