

4. HVDC Network Code: JESG Technical Workshop Feedback



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HVDC Network Code

- Issued for public consultation by ENTSO-E 7 Nov
- Consultation closes on 7 January
- Responses **only** via the ENTSO-E online tool:
 - www.entsoe.eu/consultations



JESG Technical Workshop

- Two day technical workshop held on 11/12 December
- Focused on:
 - High-level discussion of the Network Code
 - Article-by-Article review
- **Aim:** To equip GB Stakeholders with the knowledge and understand of the Code to assist them in making comments via the ENTSO-E Consultation tool.
- **Output:** High-level issues/themes will be captured in the JESG Issue Log (currently being updated)

Drafting queries

- **Key themes: Significance, Definitions, Relevant TSO**
- Who is *significant* under the Network Code?
- There are missing or incorrect definitions
- Who is the *relevant* TSOs in the context of offshore or Interconnectors?

Existing Plant queries

- **Key themes: Applicability, Modernisation, “main plant”**
- Who is the Network Code applicable to? ENTSO-E indicated it was ‘new plant’ but the wording is not clear.
- Modernisation of equipment – how do we check requirements are proportionate?
- What is ‘main plant’ in this context? Planning issues are also a major concern.

Scope queries

- **Key themes: Offshore Grids, Converter Stations, PPMs**
- Why does the Network Code place onerous technical requirement on the offshore end of a HVDC link?
 - This could stifle technology, innovation and increase costs

Discrimination queries

- **Key themes: AC vs DC, Interconnector vs Generator, TSO Assets vs non-TSO owned assets**
- Technical requirements on DC PPMs and Interconnectors are much more restrictive than on Generators (under RFG). This is discriminatory.
- TSO owned assets are not liable to compliance testing. This places them at an advantage in an open market.

Other queries

Technology neutrality:

- The Code is intended to be drafted to be technology neutral and not favour either LCC or VSC
- However, as written some of the requirement can not be meet by LCC.

NRA Approval:

- All items subject to determination by the TSOs after the Network Code has been entered in to force should be subject to NRA approval

Dispute resolution:

- What happens if TSOs, or TSOs and industry parties do not agree?
- There needs to be a dispute resolution mechanism