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17 January 2017

## **Consultation on the assessment criteria for derogations from the Grid Connection Codes**

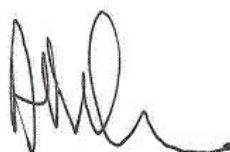
EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

We welcome the opportunity to review this draft set of criteria which will be used by generators to request derogations from the set of European Grid Connection codes (EU GCC) which have now been implemented. The requirements of the three EU GCC's, namely, Requirements for Generators (RfG), Demand Connection Code (DCC) and HVDC, will apply to any new generator wishing to connect to the network from 2018 onwards. We agree with Ofgem's proposal to use the existing GB derogations assessment criteria as the basis for the GCC derogation assessment criteria. This process is important to ensure we have a stable and robust electricity grid going forward.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact John Costa on 020 89352793, or myself.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Cox'.

**Mark Cox**  
**Head of Transmission and Trading Arrangements**

## Attachment

### Consultation on the assessment criteria for derogations from the Grid Connection Codes

#### EDF Energy's response to your questions

**Q1. Do you agree with our approach to use the existing GB derogations assessment criteria as the basis for our GCC derogation assessment criteria?**

Yes, we believe it is sensible to use the current set of derogation criteria under the Grid code as starting point and update it to match the extra requirements under the EU GCC's. This would make it clear what's required under both the current Grid code and the EU GCCs going forward for any new generator wishing to connect from 2018.

**Q2. Do you agree that the proposed GCC derogation assessment criteria, described in Annex 1, properly reflect the requirements set out in the GCCs?**

Yes. For example Ofgem has rightly picked up that as part of the robust economic case, a Cost Benefit Analysis will be required by the applicant pursuant to the requirements of the EU GCCs. On this point, we note that much of this CBA will depend on the input from the System Operator and in this regard, we welcome the fact that Ofgem has specifically stated that they will seek the views of the relevant system Operator who will hold information and data that most generators do not have access to.

We also agree it should be made applicable to any generator, not just licensed generators as the requirements of the EU GCCs apply to all types of generation going down to 800W. Changing "licensee to "the affected party seeking a derogation" would therefore be more appropriate.

**Q3. Do you identify any issues with our proposed GCC derogation assessment criteria?**

No. However, it may be helpful to provide some further guidance for applicants as to how Ofgem will assess an application and whether, for example, there are weightings Ofgem will give to each criterion. This will aid the applicant in making a robust case for the granting a derogation from complying with the EU GCCs.

**EDF Energy  
January 2017**