

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm on 17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<i>Robert Selbie</i> <a href="mailto:Robert.selbie@nationalgrid.com">Robert.selbie@nationalgrid.com</a> 07896 727701
<b>Company Name:</b>	<i>National Grid Electricity System Operator</i>
<b>Please express your views regarding the Workgroup Consultation, including rationale.</b> <b>(Please include any issues, suggestions or queries)</b>	<p>Prequalification is the process to verify the compliance of a reserve providing unit or a reserve providing group with the requirements set by National Grid. Potential reserve and response providers are required to go through the prequalification processes. Prequalification processes will be established for each Balancing Service used to manage the GB system frequency. The EU prequalification processes set out some common timescales and minimum technical requirements.</p> <p>The EU System Operation Guideline (SOGL) requires National Grid Electricity Transmission (NGET) in its role as Electricity System Operator to develop prequalification processes for:</p> <ol style="list-style-type: none"> <li>1) Frequency Containment Reserves (FCR)</li> <li>2) Frequency Restoration Reserves (FRR)</li> <li>3) Replacement Reserves (RR)</li> </ol> <p>In accordance with SOGL Articles 155, 159, and 162, National Grid must develop and make publicly available the details of these EU prequalification processes.</p> <p>In line with stakeholder feedback National Grid is doing this under the established governance of the Grid Code. In May 2018, National Grid raised Grid Code modification GC0114 to develop these processes. The modification proposal was accepted by the panel who recommended that an industry workgroup be set-up to assist in the development.</p> <p>We believe this Workgroup Consultation comes at a good point in the workgroup development of this modification to open up GC0114 to wider opinion and to help ratify the issues that have been discussed and resolved in the workgroup. A lot of work has gone into bringing in the wider views of stakeholders, who are</p>

	<p>often new to the Grid Code modification process, throughout this work and encouraging Balancing Service providers in particular to offer suggestions and provide feedback.</p> <p>National Grid has published a paper to make publicly available the details of the current EU prequalification processes in a “<i>EU Prequalification Processes paper</i>”. This fulfils a requirement in SOGL for National Grid in its role as the GBSO to publish a proposal for these processes a year after the entry into force of SOGL which was on 14 Sept 2017.</p> <p>The <i>EU Prequalification Processes paper</i> can be found on the National Grid website (link below) and is attached to this response.</p> <p><a href="http://www.nationalgrid.com/uk/electricity/codes/european-network-codes">www.nationalgrid.com/uk/electricity/codes/european-network-codes</a></p> <p>Further modification to these prequalification processes is expected through the ongoing development of Grid Code modification GC0114. Once established in the Grid Code the ongoing maintenance of these processes will be managed via normal Grid Code governance.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	<p>Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?</p>	<p>The original proposal for GC0114 better fulfils the Grid Code Objectives.</p> <p>An assessment of the original proposal against the Grid Code objectives is as follows:</p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> </ul> <p>Positive. Defining FCR, FRR and RR prequalification process in accordance with EU regulations should facilitate greater cross border coordination of frequency ancillary services.</p> <p>By defining the EU prequalification processes National Grid, reserve provides and other EU TSOs will have common expectations regarding the minimum technical capabilities and the timescales for the prequalification process.</p> <p>This should facilitate the development of cross border services, and in turn deliver a more</p>

		<p>efficient, coordinated and economical system for the transmission of electricity.</p> <p>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</p> <p>Positive. Clear prequalification processes remove a potential barrier to entry and create a transparent, level playing field in terms of the prequalification process requirements for Transmission and Distributed connected Balancing Service providers, thus improving competition. Therefore, our view is that the EU framework for prequalification of balancing services should facilitate greater competition within balancing service markets.</p> <p>A transition period has been set out for the introduction of the FCR requirements to existing providers to ensure a smooth implementation of the new requirements.</p> <p>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</p> <p>Positive. The EU prequalification processes introduce minimum technical requirements. The introduction of these minimum technical requirements should promote security and efficiency in the electricity generation, transmission and distribution systems.</p> <p>The EU Network Codes aim to introduce commonality and reduce complexity of arrangements across member states. This should improve the security and efficiency of the system as a whole.</p> <p>A clear definition of the minimum technical requirements should enable balancing providers to efficiently meet these requirements. In addition, clearly defined minimum technical requirements ensures that Balancing Services providers have the</p>
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		<p>capability necessary to manage the transmission and distribution systems securely and efficiently.</p> <p>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency;</p> <p>Positive. The definition of the EU prequalification processes is part of the implementation of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation. Developing this process under the established governance of the Grid Code should positively impact this objective as it will discharge the obligations in the EU Regulations in way that is accessible and familiar to GB parties, utilising the existing code governance processes to apply the new requirements in a transparent and proportionate way.</p> <p>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</p> <p>Neutral. No anticipated impact on the process of administering the Grid Code.</p> <p>So as noted above, the GC0114 original proposal better facilitates objectives (i)-(iv) and is neutral against objective (v).</p>
2	Do you support the proposed implementation approach?	Yes. Linking the implementation of the prequalification to the regulatory approval of individual Balancing Services as 'specific' or 'standard' services appears to be a pragmatic way to introduce these new processes in GB.
3	Do you have any other comments?	No.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No.

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	<p>We consider the mapping provided in Annex 4 to be a good overview of the current understanding of how existing GB Balancing Services map to the FCR, FRR and RR categories.</p> <p>The definitive mapping will only be known following the regulatory approval of the 'standard' and 'specific' products.</p> <p>The Balancing Services mapping is a snapshot of the status of existing Balancing Services, and will need to be updated as individual Balancing Services change in the future. Details of how National Grid anticipates Balancing Services to evolve can be found on our "<i>Future of balancing services</i>" website; <a href="http://www.nationalgrid.com/uk/electricity/balancing-services/future-balancing-services">www.nationalgrid.com/uk/electricity/balancing-services/future-balancing-services</a></p>
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	National Grid understands that the development of the processes set out in SOGL Article 182.2, 182.3 and 182.4 can only be done with the involvement of the DNOs. NGET intends to work closely with DNOs to develop the implementation of these articles.
7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	<p>As set out in the Workgroup Consultation we are concerned that the GC0114 potential alternative proposal identified in the Workgroup Consultation could negatively impact some of the Grid Code objectives. Details set out below;</p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> </ul> <p>Negative. Defining a minimum level of testing which all Balancing Service providers must undertake could restrict innovative alternatives to upfront compliance testing - such as more onerous performance monitoring. As set out in our <i>Product Roadmap for frequency response and reserve</i> (found <a href="https://www.nationalgrid.com/uk/electricity/balancing-services/future-balancing-services">here;https://www.nationalgrid.com/uk/electricity/balancing-services/future-balancing-services</a>), technology changes are enabling a greater frequency and granularity of data for performance monitoring. We will be working with industry to determine the granularity and frequency of data which will be needed for ongoing performance</p>

		<p>monitoring, thereby allowing parties to select their metering solution. The ongoing performance monitoring initiative will allow the System Operator to pull data from parties as and when needed and monitor the performance of parties against their contractual obligations.</p> <p>Our current intention is to move away from onerous compliance testing and towards more stringent performance monitoring. For this reason, the Original solution proposes as a minimum a self-certification process without any testing requirements.</p> <p>The introduction of a minimum level of testing will restrict this transition, and hence the development of an efficient, coordinated and economical system for the transmission of electricity.</p> <p>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</p> <p>Positive. For the same reasons as the Original proposal.</p> <p>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</p> <p>Negative. As with the Original solution, the introduction of minimum technical requirements should promote security and efficiency in the electricity generation, transmission and distribution systems. However, introducing common minimum testing requirements restricts the ways that providers can demonstrate their capability to National Grid. This restriction could be inefficient, and hence we view the impact of this objective to be negative.</p> <p>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency;</p> <p>Negative. We consider that including testing requirements within the Grid Code discharges the obligations from the EU Regulations in an inefficient manner for the reasons set out above.</p> <p>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</p> <p>Neutral. No anticipated impact on the process of</p>
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		administering the Grid Code.
8	<p>The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.</p>	<p>We note that some parties in the Workgroup have requested additional aspects to be set out within the legal text, including the list of Balancing Services which fall into the FCR, FRR or RR categories</p> <p>We consider that including this addition would discharge the obligations from the EU Regulations in a less efficient manner as compared to the Original solution.</p> <p>The governance on the definition and use of standard and specific products is set out in the Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing (EBGL).</p> <p>EBGL introduces a governance process which requires proposals to be developed by Transmission System Operators (TSOs) and submitted to national, regional or all EU National Regulatory Authorities (NRAs). In developing these proposals TSOs must consult stakeholders for a period of not less than one month.</p> <p>Introducing the list of the standard and specific products into the Grid Code could inadvertently lead to misalignments between the GB and EU governance processes. It would also reduce the flexibility that the SO has to establish new services commercially.</p> <p>For example, to add or remove a GB specific product National Grid is required by EBGL to:</p> <ol style="list-style-type: none"> <li>1. Develop a proposal.</li> <li>2. Consult on the change for a period of at least 1 month.</li> <li>3. Submit the proposal to Ofgem for approval.</li> </ol> <p>In accordance with EBGL, Ofgem would then have 6 months to make their decision.</p> <p>If the list of Balancing Services was also in the Grid Code, National Grid would in addition be required to raise a Grid Code modification. Workgroup and Code Administer Consultations would likely be required and Workgroup Alternative Code Modifications (WACM) may be developed before a decision either by the Grid Code Review Panel or by Ofgem.</p> <p>Throughout these two parallel processes (the GB Grid Code modification and the EU EBGL amendment process) there are many opportunities to inadvertently introduce contradictory, misleading or confusing information. Therefore, it is our view that introducing two separate governance processes (Grid Code and the EBGL process) discharges the obligations from the EU Regulations in a less efficient manner as compared to the Original solution.</p> <p>Furthermore, as set out the Workgroup Consultation, we are</p>

		concerned that codifying commercial products and services within the Grid Code would restrict NGET's flexibility in procuring products which efficiently meet the changing system needs. This could negatively impact the Grid Code objectives to facilitate competition in the generation and supply of electricity and to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity.
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	As detailed in our response to question 7 we not believe it is beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	We support the principle of providing an overview of the prequalification processes and have included an amended version of this summary in the <i>EU Prequalification Processes paper</i> .
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	The implementation of prequalification processes should not inadvertently become a barrier to entry. To avoid any disruption to existing providers a transition period for the introduction of the FCR requirements has been set out. In the case of new assets whose primary commercial focus is on the delivery of services to National Grid, it is important that the ability to prequalify and enter into a commercial contract before the asset is installed be retained as this mechanism underpins the financing of these assets. As with existing assets, changes after any initial pre-qualification would need to be reviewed.
12	"What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification	We consider that the prequalification processes should be a simple as possible, so that prequalification does not introduce unnecessary complexity which could act as a barrier to entry.  A single prequalification process for each Balancing Service, rather than a SOGL prequalification process in addition to a Balancing Service prequalification process appears to be the simpler approach.



	<p>process specifically for SOGL ahead of any specific balancing service prequalification process?"</p>	
	<p><b>Legal text comments</b></p>	
	<p><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0114 legal text session planned following the closure of this Consultation.</i></p>	<p>None.</p>

**GC0114 - System Operation Guidelines Prequalification Processes**

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Please send your responses by **5pm on 17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

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<b>Company Name:</b>	Drax Power Ltd
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ul> <p><i>The Distribution Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> </ul>

	<p>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	<p>Yes, we believe that the Original proposal and the potential alternative both better facilitate the Grid Code Objectives.</p> <p>Specifically, we believe that the potential alternative better facilitates the Grid Code objectives than the Original.</p> <p><b>Relevant Objective (i) – Positive</b></p> <p>Defining FCR, FRR and RR prequalification process in accordance with EU regulations should facilitate greater cross border coordination of frequency response ancillary services. This should deliver a more efficient, coordinated and economical system for the transmission of electricity.</p> <p>As per the potential alternative, it seems sensible to include testing requirements as part of this prequalification process. This will provide additional clarity to service providers and better facilitate a coordinated system.</p> <p><b>Relevant Objective (ii) – Positive</b></p> <p>A Common European framework for prequalification of balancing services will enable the development of standard products such as TERRE and MARI and should facilitate greater competition within balancing markets.</p> <p>As per the potential alternative, harmonising testing requirements will greater facilitate competition by ensuring parties are doing the correct tests and submitting the correct values.</p>

		<p><b>Relevant Objective (iii) – Positive</b></p> <p>For the reasons given above and the fact that the prequalification processes consider minimum technical requirements, GC0114 should promote security and efficiency in electricity transmission.</p> <p><b>Relevant Objective (iv) – Positive</b></p> <p>EU regulation SOGL requires NGET to develop and publish prequalification processes for FCR, FRR and RR. GC0114 will ensure compliance with this requirement.</p>
2	Do you support the proposed implementation approach?	We support the implementation approach whereby the SOGL prequalification processes for individual Balancing Services will come into effect following the regulatory approval of that Balancing Service as a Standard or Specific Product.
3	Do you have any other comments?	<p>Yes, we have some general comments on the areas that the workgroup is seeking legal advice.</p> <p>Currently, providers are free to price Mandatory Frequency Response as they choose. As such, National Grid should call on whichever service is most efficient and economic to meet their needs, regardless of whether it's a mandatory service or not.</p>
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	<p><i>If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website,</i></p> <p><a href="https://www.nationalgrid.com/uk/electricity/codes/grid-code">https://www.nationalgrid.com/uk/electricity/codes/grid-code</a> and return to the Grid Code inbox at <a href="mailto:grid.code@nationalgrid.com">grid.code@nationalgrid.com</a></p>

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	No, we agree with the balancing services mapping.
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and	N/A

	182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	
7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	<p>We agree with the proposer of the alternative that adding the harmonised testing will clarify the requirements that applicants need to meet. This will prevent applicants being surprised that after having prequalified, they are still ineligible and have to submit test results before being allowed to provide the service.</p> <p>Codified testing requirements will add industry oversight and correct any disparities between testing requirements for different parties.</p>
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	<p>Drax considers that there is benefit in codifying the mapping of the balancing services into either FCR, FRR and RR.</p> <p>The additional industry oversight of the mapping will provide comfort to parties that balancing products can not be moved between categories or new products introduced without the formal modification process being followed.</p>
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	See response to Question 7.
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	No.
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	There has been significant entry into the FFR, STOR and Fast Reserve markets from new parties under the existing rules. As such, we do not consider there to be a defect with the current approach.
12	What are your views on having either a separate pre-qualification process for each balancing	We believe there is merit in having one pre-qualification process, this will ensure that equipment testing is efficient and that there is no double testing

	<p>service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?</p>	<p>for the same requirements.</p>
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	<p><b>Legal text comments</b></p>	
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	<p><b><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i></b></p>	<p>No.</p>
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## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm** on **17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

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<b>Company Name:</b>	<i>The Association for Decentralised Energy</i>
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ol> <p><i>The Distribution Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the</li> </ol>

	<p>Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0114 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	<p>The ADE believes that the GC0114 original proposal better facilitates Grid Code Objectives iv), i) and iii).</p> <p>If the original (rather than the alternative) proposal is implemented, we believe that it will also facilitate the objective ii), relating to promoting competition in the generation and supply of electricity by facilitating greater competition within balancing markets.</p> <p>Elements discussed in the alternative proposal or the consultation report (but not contained in the original proposal), such as codification into the Grid Code of the FCR, FRR and RR products or the inclusion of testing requirements for FCR, FRR and RR in the Grid Code, could potentially have a negative impact on the objective ii). This is because, by enshrining these elements in the Grid Code, they could make them more difficult to adapt to future business models, product requirements and innovative product offerings. This would be detrimental to competition and to market entry by innovative new providers.</p>
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>The ADE believes that National Grid's worry (stated on p.14 of the consultation document) that, without access to the mandatory market, "NGET (SO) would be relying on enough reserve providers deciding to participate in the commercial market to secure the system, which would not be guaranteed", is unfounded.</p> <p>In most other markets worldwide, reserve is procured through competitive commercial markets. National Grid's aim should be to secure the system reliably at the lowest overall cost; this involves paying attention to all costs, not just those on their accounts. Procuring reserve through competitive market</p>



		<p>tenders is the proven way to do this.</p> <p>Mandatory requirements tend to be more expensive as they remove the ability for providers to make commercial judgements about what participation is likely to be rational. Imposing obligations on these parties and forcing them to have the ability to provide response services which will never be economic to use is expensive for the parties and inefficient for the system.</p>
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	N/A
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	N/A
7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	The ADE is concerned by the proposal within the Alternative Code Modification to enshrine testing requirements within the Grid Code. As outlined in our response to Question 9, it would be more appropriate to locate testing requirements within the Standard Contract Terms for each service. This has the benefit of locating the requirements in a place that participants are used to looking for them, rather than forcing them to search through the Grid Code, and of allowing National Grid to update these requirements more easily if innovative product offerings or business models emerge that require this.
8	The GC0114 Original proposed modification does not include the	The ADE does not believe that codifying the FCR, FRR or RR products into the Grid Code would be

	codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	beneficial. Instead, the parameters of these products should be set out in the Standard Contract Terms for each of them. This where participants are most used to looking, rather than within the Grid Code, so is the most intuitive place to locate them. It also provides more flexibility for National Grid to clarify or update specifications around the products in response to future market changes.
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	<p>The ADE does not believe that the testing requirements for FCR, FRR and RR should be set out in the Grid Code. It is important that participants, particularly new entrants, be aware of these requirements. The most appropriate place for the requirements would be within the Standard Contract Terms, where participants are most used to looking, rather than within the Grid Code.</p> <p>In addition, enshrining testing requirements within the Grid Code risks making them difficult and administratively intensive to alter, constraining National Grid's ability to update them to reflect the characteristics of new products or services. This could have a negative impact upon competition, creating unnecessary barriers to entry for potential new providers.</p>
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	N/A
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	The ADE supports the proposal that a provider should be able to pre-qualify without assets. As noted in the workgroup report, it is important that the ability to prequalify and enter into a commercial contract before the asset is installed be maintained, as this underpins the financeability of assets. Requiring assets to be in place before prequalification would have a negative impact on availability of capital financing, thereby creating a major and unnecessary barrier.
12	"What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?"	<p>This depends on the extent of the pre-qualification process. If it is simply a self-certification exercise involving the ticking of a box and submission of a small number of relevant documents, there is no issue with there being an upfront prequalification process specifically for SOGL.</p> <p>If, however, the pre-qualification process has any more detailed requirements, we recommend that</p>

		<p>there by a separate pre-qualification process for each balancing service including the SOGL criteria. Otherwise, there is a risk that the upfront prequalification process specifically for SOGL could accidentally exclude future providers with business models or service offerings that are different to those that exist today.</p>
	<p><b>Legal text comments</b></p>	
	<p><i><b>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</b></i></p>	<p>N/A</p>

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm on 17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<i>Helen Stack, <a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a></i>
<b>Company Name:</b>	<b><i>Centrica Plc, including REstore</i></b>
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ul> <p><i>The Distribution Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the</li> </ul>

	<p>Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Centrica believes that the GC0114 original proposal better facilitates Grid Code Objectives iv), i) and iii).
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	Centrica would like to see enhanced transparency and stakeholder consultation around the development and updating of testing requirements. However, the most appropriate place for these requirements is within the Standard Contract Terms.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	No
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	N/A

7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	Centrica believes there is scope to improve the transparency and stakeholder consultation processes. However, we also want to National Grid to be able to update testing requirements easily, including to support the development of innovative product offerings. For this reason, we do not currently support placing the testing requirements within the Grid Code.
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	Centrica does not believe it would be beneficial to the market to codify the FCR, FRR or RR products into the Grid Code. Centrica does want transparency around the description of these products, but we agree with the argument made by National Grid that codification would mean it has less flexibility to develop and improve their products in support of the market.
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	<p>Our response is the same as for Q7. Centrica believes the testing requirements need to be transparent and easily located. However, we do not believe it would be beneficial to set these out in the Grid Code because the change process is cumbersome. The testing requirements can be placed in the Standard Contract Terms, which can be more easily updated.</p> <p>We would however like to see improved processes and better engagement of stakeholders in the existing change processes for these Standard Contract Terms.</p>
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	No
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	If a provider can pre-qualify without assets then there need to be robust processes in place to disincentivise contract holders from pulling out or use Cure Plans. It is not clear from the consultation document how the proposed approach of stringent performance monitoring would deal with this.
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific	We feel that an upfront SOGL pre-qualification process could be excessive and are leaning towards a combined approach.

	balancing service prequalification process?"	
	<b>Legal text comments</b>	
	<b><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i></b>	N/A

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm on 17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<i>Saskia Barker (saskia.barker@flexitricity.com)</i>
<b>Company Name:</b>	<i>Flexitricity Limited</i>
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ol> <p><i>The Distribution Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the</li> </ol>



	<p>Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Yes, the original proposal better facilitates GC objective (iv) since it implements the obligations from the SOGL in GB.
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	No
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	No
7	The workgroup is interested to hear views on the draft	The Alternative Modification would codify testing requirements in the Grid Code, which would be more

	Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	<p>appropriate to have in the Standard Contract Terms. Currently most non-BM service providers are not signed up to the Grid Code, so it is not an appropriate place to codify obligations on them. The SCTs also have a governance process that non-BM service providers are used to participating in.</p> <p>Non-BM service providers that are not party to the Grid Code can also not raise modifications themselves but must do so through a GC party or Ofgem, so it would be more arduous for these parties to be able to raise a medication to the testing requirements.</p>
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	<p>It would not be beneficial to the market to have this codification. Non-BM service providers that are not party to the Grid Code cannot raise modifications themselves but must do so through a GC party or Ofgem, so it would be more arduous for these parties to be able to make any required changes to the definitions of these services.</p> <p>Innovative solutions usually come from small parties that are not currently signed up to the Grid Code, so codifying definitions in a document smaller providers are not used to looking, or can easily change, is likely to create a barrier to entry and discourage innovation.</p>
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	<p>It would not be beneficial to the market to have this codification, it is more appropriate to have the testing requirements in the Standard Contract Terms for the service.</p> <p>Currently most non-BM service providers are not signed up to the Grid Code, so it is not an appropriate place to codify obligations on them. The SCTs also have a governance process that non-BM service providers are used to participating in.</p> <p>Non-BM service providers that are not party to the Grid Code can also not raise modifications themselves but must do so through a GC party or Ofgem, so it would be more arduous for these parties to be able to raise a medication to the testing requirements.</p>
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	No

11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	Yes, providers should be able to prequalify without assets, like they currently can in the Capacity Market, to secure revenue that will help get the project built, especially for services where the delivery may be years away. Proper checks and restrictions need to be put in place to stop parties from bidding speculatively for assets that will never exist, however.
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?”	This is dependant on the type of pre-qualification required. A process requiring self-certification and some documentation would be acceptable as upfront pre-qualification. A full-on testing regime would not.  Otherwise, there is a risk that the upfront prequalification process specifically for SOGL could accidentally exclude future providers with business models or service offerings that are different to those that exist today.
	<b>Legal text comments</b>	
	<b><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i></b>	No

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm** on **17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<i>John West, 07903 551469</i>
<b>Company Name:</b>	<i>Energy Networks Association - This response is provided on behalf of ENA's Open Networks project.</i>
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p>This response has been provided on behalf of the Energy Networks Association (ENA) and the Open Networks project that the ENA is co-ordinating on behalf of GB electricity network operators including Distribution Network Operators (DNOs). The Open Networks project has a number of workstreams aimed at improving whole system (Transmission-Distribution) processes and developing Distribution System Operator (DSO) functionality and models.</p> <p>Given the increasing scope to take reserve services from distributed energy resources, it is important that distribution network aspects are considered in assessing pre-qualification requirements and processes for services. We are grateful that the GC0114 workgroup recognised the need for Distribution Network Operator involvement and that question 6 was included to gather views on DSO involvement. As yet DNOs have not input directly to the GC0114 workgroup. In addition, contrary to sections 1 and 3 of the workgroup's report, we don't believe that the modification has been discussed as yet with the Distribution Code Review Panel.</p> <p>This response is largely focussed on the need for effective liaison between NGET (SO) and DNO/DSOs to enable the full and effective use of distribution connected resources to provide reserve services to NGET (SO).</p>

## Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	<p>We believe that both the original proposal and the alternative proposal will help facilitate the Grid Code objectives if DNO/DSO roles are clarified.</p> <p>DNOs would prefer for the testing requirements to be included in the Grid Code as per the alternative proposal in Annex 2.</p>
2	Do you support the proposed implementation approach?	<p>As well as making the DNO/DSO role in prequalification more clear, we support the implementation approach including:</p> <ul style="list-style-type: none"> <li>- the timeline for the prequalification process, and</li> <li>- an approach where prequalification commences as “standard” and “specific” reserve products are agreed under Articles 18, 25 and 26 of EBGL.</li> </ul> <p>We agree that information gathered through the connection process for new service providers could be used to simplify the pre-qualification process for transmission connected units. The process should be clear and distinct though as in some cases, prospective service providers will look to opt into services through pre-qualification (European wide services for example).</p> <p>For new distribution connected units, information wont generally be available to NGET (SO) as part of the connection process and distinct pre-qualification processes would be required.</p>
3	Do you have any other comments?	Please see answers to the specific GC0114 questions below.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	<p>It is not proposed to raise an alternative.</p> <p><i>If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website,</i></p> <p><a href="https://www.nationalgrid.com/uk/electricity/codes/grid-code">https://www.nationalgrid.com/uk/electricity/codes/grid-code</a> and return to the Grid Code inbox at <a href="mailto:grid.code@nationalgrid.com">grid.code@nationalgrid.com</a></p>

### Specific GC0114 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	The mapping presented in Annex 4 of the Workgroup report is reasonable for NGET's current set of response and reserve products.
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	<p>We would like the prequalification process to more clearly bring out the interaction between NGET(SO) and DNO/DSOs. Our preferred approach would be to base the process on the prequalification process that is being developed for Project TERRE.</p> <p>In broad terms, this process comprises the NGET (SO) notifying DNO/DSOs of any distribution connected units including sub-components that are seeking to provide a reserve service. (Sub-components are any discrete generation or demand elements that might be aggregated by a service provider to provide the service.) The NGET (SO) would gather data from prospective service providers and pass this to DNO/DSOs including:</p> <ul style="list-style-type: none"> <li>• The identification and location of reserve units (at sub-component level) including the point of connection to the distribution network, MPAN and post code (as available).</li> <li>• The voltage level at the point of connection to the distribution network for each unit (at sub-component level).</li> <li>• The maximum reserve capacity of each unit (at sub-component level).</li> <li>• The maximum rates of change of active power for each unit (at sub-component level).</li> <li>• Whether connection agreements are in place with DNO/DSOs for units (at sub-component level), the relevant DNO/DSOs and any restrictions on units that are notified in connection agreements.</li> </ul> <p>The DNO/DSOs would then confirm if a connection agreement is in place and notify if there are potential restrictions to unit operation and effective service delivery through the nature of the connection to the distribution network and any network limitations (e.g. ANM arrangements).</p> <p>The DNO/DSOs would not preclude a unit from</p>

		<p>providing services at the pre-qualification stage but would provide further information to the NGET (SO) (and to the prospective service providers) on any network limitations which might affect the capability of the units to provide the proposed service.</p> <p>To address concerns on prequalification without assets, DNOs would support potential service providers in clarifying potential restrictions ahead of, or during, a network connection process.</p>
7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	In principle we support the testing requirements being visible and clear to prospective service providers. One way to achieve this is to build on the existing practice and include the testing requirements in the Grid Code. The Workgroup Alternative Code Modification develops this approach and should be developed further.
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	<p>We recognise that codification of FCR, FRR and RR products could reduce the flexibility of the NGET (SO) to bring forward new solutions to system needs.</p> <p>However, the FCR, FRR and RR products to be used in GB and their descriptions should be transparent to GB stakeholders. This will help ensure a level playing field for potential service providers and will reduce the potential for conflicts of service with other MW services that network operators may be developing.</p> <p>There may be different ways to achieve transparency. One way could be through codification into the Grid Code. Another could be through description of the products in NGET's LC16 statements. We would ask the Workgroup to further consider options to achieve transparency.</p> <p>We also note from the workgroup consultation that the EBGL requires the approval of "specific" products for use in GB alongside the "standard" European-wide products. Further detail of how this will be achieved might inform how transparency is achieved and the need or otherwise for codification.</p>
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative	As the testing requirements for FCR, FRR and RR are highly technical, we believe that potential service providers would benefit from having clear visibility of these requirements.

	modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	The alternative modification builds on the current practice of including testing requirements in the Grid Code. This is preferable to not having the testing requirements set out as per the original proposed modification.
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	We agree with the summary steps outlined under Section 8 <b>High Level Process Based on SOGL Articles 155 and 182</b> . We believe that the process elements outlined in the response to question 6 above fit with these steps.
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	For prequalification without assets for reserve providing units that are to be connected to a distribution network, a discussion on service provision could be arranged with the DNO/DSO to better understand potential restrictions through network limitations. This could take place when the developer is considering investment in new assets or as part of the process for connection to the distribution network.
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?”	We support a separate pre-qualification process for each balancing service. This would be more thorough and should be more timely as any network restrictions that might impact units are more likely to be identified if pre-qualification takes place shortly before assets are likely to be participating in the service.  If a potential service provider is seeking to pre-qualify for more than one balancing service, we would support the assessment of concurrent applications.
	<b>Legal text comments</b>	
	<b><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i></b>	Having read through the full legal text, we believe that some of the proposed terminology needs to be updated to be more precise and in line with other Grid Code terminology. There are further comments on the text in the attached pdf document.  The draft legal text below includes some suggested changes to support the effective liaison between NGET (SO) and DNO/DSOs.  We would welcome the opportunity to further review



the legal text before it is finalised by the workgroup.

Draft Legal Text

**New paragraph BC4.1.1(d):**

(d) Within 3 months of confirming all information has been provided, for units connected to distribution networks, NGET shall liaise with the relevant DNO(s) to identify potential limitations imposed on the proposed Balancing Services Provider by the distribution networks.

**Modify paragraphs BC4.2.2, BC4.3.2 and BC 4.42 to read:**

In addition to the requirements in BC4.2.1/4.3.1/4.4.1, where a relevant **Balancing Service** is provided by reserve providing groups or units connected to distribution systems, NGET shall ensure that the prequalification process requires the following to be specified by the reserve provider;

- a) the voltage levels and points of connection to the distribution networks of the reserve providing units or groups;
- b) the DNO(s) who operate the distribution systems to which the reserve providing units or groups are connected;
- c) the type of active power reserves to be provided;
- d) the maximum reserve capacity provided by the reserve providing units or groups at each connection point;
- e) the maximum rate of change of active power for each of the reserve providing units or groups; and
- f) whether connection agreements are in place for each of the reserve providing units, the relevant DNO and any restrictions on operation that are notified in the connection agreements.

The relevant DNOs will identify potential distribution network restrictions on the provision of the proposed Balancing Service by the reserve providing groups or units.

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm** on **17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<i>Tim Ellingham</i>
<b>Company Name:</b>	<i>RWE Supply and Trading</i>
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ul> <p><i>The Distribution Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the</li> </ul>

	<p>Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Both the original and the alternative are better than the existing but the alternative provides more information to users as to what is expected.
2	Do you support the proposed implementation approach?	I support the alternative but feel it should be taken further regarding service description.
3	Do you have any other comments?	
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	<i>If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website, <a href="https://www.nationalgrid.com/uk/electricity/codes/grid-code">https://www.nationalgrid.com/uk/electricity/codes/grid-code</a> and return to the Grid Code inbox at <a href="mailto:grid.code@nationalgrid.com">grid.code@nationalgrid.com</a></i>

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	

7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	There is always talk about ease of access to electricity markets but in regards to the EU wide reserve products there is no single place in the UK codes which tells a new user, simply, what is required and what needs to be done. Codification of FCR, FRR and RR would, or to some degree, illustrate to a new user what is required for UK participation.
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	I believe it is beneficial to have this information as it should enable faster prequalification by removing ambiguity of interpretation of the base EU code.
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	This is an important element and can affect investment decisions and project viability, plant should be able to pre-qualify based on proposed technical ability. An inability to do so would add a risk premium to a potential project.
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?”	I believe that having a separate pre-qualification process for each service would be clearer in demonstrating what is being qualified for.

	<b>Legal text comments</b>	
	<i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i>	

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm on 17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	Alastair Frew
<b>Company Name:</b>	ScottishPower Generation Ltd
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ol> <p><i>The Distribution Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the</li> </ol>

	<p>Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0114 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Yes, with inclusion of the proposed alternative on testing.
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	<i>If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website, <a href="https://www.nationalgrid.com/uk/electricity/codes/grid-code">https://www.nationalgrid.com/uk/electricity/codes/grid-code</a> and return to the Grid Code inbox at <a href="mailto:grid.code@nationalgrid.com">grid.code@nationalgrid.com</a></i>

### Specific GC0114 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	No
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	It appears that the provider has to apply to the DSO who then subsequently forwards the application to the TSO. The biggest potential issue appears to be that the DSO can limit and even stop the supplier from being permitted to provide the service. It is not clear exactly what these restrictions would be based on or how they would be applied.

7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	We support the alternative.
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	Whilst it would be more transparent to codify the products it is not clear it should be covered by this workgroup.
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	We support including testing within the prequalification process as current the testing documents include the statement that these tests are required for prequalification.
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	No
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	The prequalification process written in the SOGL indicates that the provider has to demonstrate the technical requirements so it is difficult to see how this can be done without equipment, however as these are all RFG requirements the new equipment needs to be compliant. The bigger issue is the potential network access restrictions which can be imposed during prequalification process which needs to be dealt with before connection is agreed.
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically	We believe that the prequalification process is best for a provider type ie FCR, FRR or RR and not for a specific service.



	for SOGL ahead of any specific balancing service prequalification process?"	
	<b>Legal text comments</b>	
	<i><b>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0114 legal text session planned following the closure of this Consultation.</b></i>	

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm** on **17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<i>Garth Graham (garth.graham@sse.com)</i>
<b>Company Name:</b>	SSE
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ol> <p><i>The Distribution Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the</li> </ol>

	<p>Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Whilst in principle it appears that the Original may, on the face of it, better facilitate the applicable objective when compared to the baseline, on reflection it does not better meet the applicable objectives when compared with the potential alternatives as set out in the Workgroup consultation and, in particular, the potential alternative in Annex 5.
2	Do you support the proposed implementation approach?	There is a lack of detail on the proposed implementation approach and therefore we cannot support it at this time.
3	Do you have any other comments?	There is a total lack of (near) real time transparency around the volume of services provided via each specific and standard product. As such this has a negative effect on competition in the provision of specific and standard products.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No.

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	We note that there is a lack of clarity provided by the TSO in terms of what are the technical minimum requirements for FCR (Article 154) FRR (Article 158) and RR (Article 161). Therefore it is not possible for us to review the Balancing Services mapping at this time.
6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles	We note the four steps listed at the bottom of page 21/ top of page 22 and agree with that approach.

	as detailed in Section 8?	
7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	We have reviewed the potential alternative noted in Section 9 and shown in Annex 5. We believe this potential alternative has considerable merit when compared with the Original proposal as it ensures that the important testing regimes; for FCR, FRR and RR; are clearly set out for stakeholders (and not subject to unilateral change – without regulatory oversight).
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	<p>It is our understanding that the TSO is required to set out the technical minimum requirements for FCR (Article 154) FRR (Article 158) and RR (Article 161). It is our view that, in accordance with the advice received from BEIS and Ofgem, this should be done via the Grid Code.</p> <p>We see little advantage to stakeholders in the opposite approach – that is, in having this been undertaken in secret by the TSO, without any regulatory oversight or the ability for stakeholders to provide, via open governance, different solutions – and note that the TSO seems to be the only party that supports it (the TSO) having such unilateral powers.</p> <p>Codifying the technical minimum requirements for FCR, FRR and RR will ensure transparency (as well as NRA oversight) for all stakeholders. It is also better for competition which, in turn, is better for end consumers.</p>
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	<p>Clarification around the testing is a key aspect of the FCR, FRR and RR obligations from the perspective of stakeholders.</p> <p>Therefore setting the testing arrangements out in the Grid Code will be positive for stakeholders as it will ensure transparency (as well as NRA oversight) for all stakeholders. It is also better for competition which, in turn, is better for end consumers.</p>
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	We believe that an independent legal view of the four questions noted on page 17 of the Workgroup consultation report would assist stakeholders in responding, in due course, to the Code Administrator Consultation.
11	Do you have any views on pre-	Any assets will need to meet the technical minimum

	qualification without assets, as detailed in Section 7?	<p>requirements for FCR, FRR or RR respectively as, for example, set out in the wording in Article 155 which refers to “a potential FCR provider”. Similar wording appears in terms of FRR (Article 159) and RR (Article 162).</p> <p>Thus this also applies to prequalification without assets – as it will be necessary for any <u>potential</u> FCR provider (with, or without, assets) to demonstrate that it complies with the technical minimum requirements for FCR (or FRR / RR).</p>
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?”	<p>It is a requirement of SOGL that a party applies to pre-qualify for each of the services; FCR, FRR or RR; as the technical minimum requirements are different for each (as witnessed by the obligations etc., detailed in Articles 154, 158 and 161 respectively).</p> <p>In our view compelling parties to prequalify for FCR, FRR or RR, as part of the connection conditions (be that the ‘CCs’ or ‘ECCs’) is incompatible with (i) the RfG, DCC or HVDC requirements and (ii) SOGL.</p>
	<b>Legal text comments</b>	
	<b><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i></b>	<p>It is not clear to us why GC0114 legal text matters should be considered by the GC0104 legal text session?</p> <p>In the context of the draft legal text for GC0114, we note that the solution has still to be finalised, therefore we are not in a position to provide final comments on the legal text at this time.</p> <p>That having been said, the proposed wording in BC4.1 as regards the Connection Conditions and the European Connection Conditions is incompatible with EU law, for the reasons we note in our answer to question 12 above.</p>

## Grid Code Workgroup Consultation Response Proforma

### GC0114 - System Operation Guidelines Prequalification Processes

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 by **5pm on 17 September 2018** to [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Joseph Henry at [joseph.henry2@nationalgrid.com](mailto:joseph.henry2@nationalgrid.com)

<b>Respondent:</b>	<p>Greg Scott-Cook  <a href="mailto:Greg.scott-cook@uniper.energy">Greg.scott-cook@uniper.energy</a>            07964 123043</p>
<b>Company Name:</b>	Uniper
<p><b>Please express your views regarding the Workgroup Consultation, including rationale.</b></p> <p><b>(Please include any issues, suggestions or queries)</b></p>	<p><i>For reference, the Grid Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity)</li> <li>iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole</li> <li>iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ol> <p><i>The Distribution Code objectives are:</i></p> <ol style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> </ol>

	<p>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0104 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Supportive of the Original proposal as it seeks to implement the requirements for SOGL within the existing processes as much as possible and hence minimises disruption for service providers
2	Do you support the proposed implementation approach?	We support the approach in as much as it seeks to have a minimal impact on existing process but we would want transparency on what services the SO are offering. Regarding self-certification, this needs to be robust enough to give confidence that the capability will be there to deliver the service at the required level.
3	Do you have any other comments?	Providers should only be pre-qualified for services they can provide. Actions may be taken by the SO to contract for services, or providers to offer services, based on pre-qualification status. Hence pre-qualification for services that cannot be provided has the potential to lead to inefficient outcomes in procuring services and must be avoided.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

### Specific GC0104 questions

Q	Question	Response
5	Do you have any views on the Balancing Services mapping provided in Annex 4 and detailed in Section 8?	This seems fine

6	The workgroup wishes to better understand the implementation of SOGL Article 182.2, 182.3 and 182.4 in GB. In particular, the workgroup would be interested to hear DNO views on the GB implementation of these articles as detailed in Section 8?	N/A
7	The workgroup is interested to hear views on the draft Workgroup Alternative Code Modification presented in both Section 9 and Annex 2?	The key difference is around the specification of testing requirements in the Grid Code modification. Hence see answer to Q9 regarding testing.
8	The GC0114 Original proposed modification does not include the codification into the Grid Code of the FCR, FRR or RR products and the Workgroup would be interested in the views of other parties as to whether or not this would be beneficial to the market to have this codification.	It is important that providers are aware of the services available to the SO but to put this into the Grid Code may make it an onerous process to make changes.
9	The current GC0114 Original proposed modification does not include FCR, FRR or RR testing whereas the potential alternative modification the Workgroup would. The Workgroup is interested in the views of other parties as to whether or not it would be beneficial to set out in the Grid Code the testing requirements for FCR, FRR and RR.	The appropriate testing should be defined for each service but because the SOGL categories of FCR/FRR/RR cut across many services it is not possible to have a single test without diluting the effectiveness of the testing or excluding certain providers.
10	In light of the pre-qualification simplified wording in Section 8, do you have any comments on this?	No
11	Do you have any views on pre-qualification without assets, as detailed in Section 7?	If potential assets are allowed to pre-qualify then there must be incentives to ensure that the provider proves that they can deliver the service as soon as possible and before the delivery period commences.
12	“What are your views on having either a separate pre-qualification process for each balancing service including the SOGL	We support avoiding additional processes but when applying for a service the provider needs to be aware of what commitment they are taking on and the implications of making the application, e.g. whether



	<p>criteria or an upfront pre-qualification process specifically for SOGL ahead of any specific balancing service prequalification process?"</p>	<p>they will become a mandatory service provider as a result, and given the option as to whether or not to sign up.</p>
	<p><b>Legal text comments</b></p>	
	<p><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided on the response proforma. These will then be discussed at the GC0104 legal text session planned following the closure of this Consultation.</i></p>	