

Grid Code Industry Consultation Response Proforma

GC0074 GCRP Membership

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 **1 August 2014** to 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

Respondent:	<i>Guy Phillips (guy.phillips@eon-uk.com)</i>
Company Name:	<i>E.ON UK plc</i>
1. What are your views on Interconnector users being given a seat on the GCRP as an occasional attendee when it is deemed appropriate by the GCRP and/or the Code Administrator based on the subject matter, rather than as a permanent member where an Interconnector Representative would be expected to attend all meetings.	<i>With the number of attendees to the panel under its current governance arrangements and under the proposal, it seems sensible to request interconnector representation by exception when there is relevant subject matter on the agenda.</i>
2. Do you agree with the group that (i) the Scottish TOs should continue to have a seat on the Panel (ii) that the DNOs should continue to be represented by three seats on the Panel (2 for England & Wales and 1 for Scotland) and (iii) that manufacturers should not be represented on the Panel.	<i>We agree with the proposal. As manufacturers are not party to the Industry Codes and would not incur direct costs of any changes, it is not appropriate that they are represented on the Panel.</i>
3. Do you believe that each NGET Representative should hold 1 vote each, as for other representatives, or that this should be reduced to, for example, 2 votes between the proposed 4 NGET Representatives.	<i>Presently Grid Code business is broadly progressed on a consensus basis, with no voting taking place. Should voting become normal for the Grid Code Review Panel we would anticipate the need for voting rights to be reviewed to ensure the voting balance was appropriate and representative. In that instance we can see the case for reducing the number of votes held by NGET Representatives from 4 to 2.</i>
4. How do you think a tied vote should be dealt with in an election?	<i>Where a tie cannot be resolved both the CUSC and BSC draw lots. This would therefore seem appropriate for the Grid Code.</i>

<p>Do you believe that GC0074 better facilitates the appropriate Grid Code objectives?</p>	<p><i>For reference the applicable Grid Code objectives are:</i></p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p><i>(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);</i></p> <p><i>(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; and</i></p> <p><i>(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.</i></p> <p><i>With reference to objective iv); with the current consensus based approach to the development of the Grid Code, ensuring that there is sufficient and appropriate representation on the Grid Code Review Panel should allow the licensee to more efficiently discharge its licence obligations.</i></p>
<p>Please provide any other comments you feel are relevant to the proposed change.</p>	<p><i>As the GC0086 proposals for open governance to be introduced to the Grid Code has been raised and intended to proceed to a Working Group, it would be appropriate to keep the implications of GC0074 under review. If it is intended to implement open governance arrangements to the Grid Code we could envisage the case that the composition of the Grid Code Review Panel needs to be revisited as part of GC0086, to ensure the Panel functions appropriately and efficiently under new governance arrangements. In this regard it may be more appropriate for the Grid Code Review Panel composition and functions to be more akin to the CUSC and BSC Panels.</i></p>