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Trisha McAuley
Independent Chair
Grid Code Panel

21 June 2018

Dear Ms McAuley

Grid Code Prioritisation

The Flexible Generation Group (FGG) represents the owners of and investors in small scale, flexible generation. These power stations are embedded in distribution networks and provide a variety of vital services to the system operator to help it deliver secure, economic supplies to electricity customers. We also participate in the Capacity Market and have made significant investment in new capacity on the back of CM agreements. While not directly bound by the Grid Code, we are impacted by many of the changes made to it.

We are extremely concerned by the way the Grid Code Panel is prioritising change proposals. As a matter of principle, we believe code administrators should resource themselves to manage the changes raised. If a party needs a change to bring forward their new, disruptive technology prioritisation may see their proposal languish at the bottom of the queue, never making it forward. This seems unduly discriminatory and anti-competitive. As this seems to be an issue with both the CUSC and the Grid Code, we would hope you will raise it with National Grid's (NG) senior managers.

In particular, we are concerned by the lack of progress on modification GC0109: The open, transparent, non-discriminatory and timely publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc., issued by or to the Network Operator(s). This modification has gone to the bottom of NG's priority list despite it being an issue raised informally years ago. At that time, NG said it would resolve the confusion of publication of warnings across multiple platforms, but never did. SSE were instead forced into a formal change proposal to try and require NG to comply with a very reasonable request from the whole industry.

We learnt from the GCDF last week that NG were not planning any meetings on GC0109 until September, so it would not be implemented until winter 2019/20 at the earliest. Compared to all the other changes, this would be a top priority for our companies and we suspect for others such as traders, suppliers and large industrial customers. All of these parties must respond to system warnings and the current system is inefficient and particularly difficult for smaller parties to follow.

In the context of the prioritisation criteria, GC0109 is: not complex; is of commercial importance to the whole market; would improve security of the system; and should be taken forward with urgency. We would therefore ask that the Panel reconsiders the priority it is giving to modifications vital to the GB energy market over those related to issues such as EU codes or SO separation.

We would further note that GC096, on the treatment of storage, also seems to be languishing in the process. For those looking in on the change management process, this also looks like the Code Administrator prioritising changes that benefit their own company over those that benefit the wider market.

I would be happy to discuss this further if of help.

Yours sincerely



pp
Mark Draper
Chairman

cc: Lesley Nugent, Ofgem (Lesley.Nugent@ofgem.gov.uk)
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