

1 Grid Code Industry Consultation Response Proforma

GC0107 / GC113: The open, transparent, non-discriminatory and timely publication of the generic and/or Power Generating Module specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the Requirements for Generators (GC107) and Demand Connection Conditions (GC113)

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.

A Workgroup Consultation has already been run for GC0107, which closed on 6 September 2019. Responses to this consultation are available by accessing the file “GC107/113 9 October Workgroup Papers” which is located under the “Workgroup tab” at:

<https://www.nationalgrideso.com/codes/grid-code/modifications/gc0107-open-transparent-non-discriminatory-and-timely-publication>

On the basis that GC0113 could impact different stakeholder groups, the Workgroup on 9 October 2019 agreed to run a separate Workgroup Consultation for GC0113.

Please send your responses by **5pm on 22 November 2019** to Grid.Code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

Any queries on the content of the consultation should be addressed to Paul Mullen at paul.j.mullen@nationalgrideso.com

These responses will be considered by the Workgroup at their next meeting at which members will also consider any Workgroup Consultation Alternative Requests. Where appropriate, the Workgroup will record your response and its consideration of it within the Final Workgroup Report which is submitted to the Grid Code Review Panel.

Respondent:	<i>Alan Creighton</i>
Company Name:	<i>Northern Powergrid</i>
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<i>(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i> <i>(b) Facilitating effective 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> <i>(c) 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</i>

	<p><i>system operator area taken as a whole;</i></p> <p><i>(d) 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</i></p> <p><i>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p>
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Standard Workgroup consultation questions

Q	Question	Response
1	Do you believe that GC0113 Original proposal and the 2 proposed Workgroup Alternatives as set out in Annex 8 of this document better facilitates the Applicable Grid Code Objectives?	No. In our view it would increase both the costs incurred by and the risk of regulatory non-compliance by network operators, as noted in our response to question 9, without delivering any tangible benefit for stakeholders. Consequently, we believe that, whilst the proposal is neutral to Grid Code objectives a), b) and c), it is detrimental to objectives d) and e).
2	Do you support the proposed implementation approach?	No

Q	Question	Response
3	Do you have any other comments?	<p>As set out in our response to question 10, we are of the view that (i) most of the settings and requirements with which stakeholders need to comply are already available in public documents and (ii) any variations from these will be site-specific, once the market for demand side response is established. The application of the proposed changes to the DCC (rather than GC0107 which related to the RfG) is less clear as demand side services at distribution level are still in their infancy, such that it is likely that the initially agreed contracts with service providers would vary to some extent as the market develops. We would expect standard requirements and conditions to develop in the fullness of time and that these requirements would, wherever possible, be codified.</p> <p>Consequently, increased transparency of these settings and requirements is not necessary and will result in additional costs for network operators without any associated benefits.</p> <p>There are several comments on the proposed legal text embedded in the marked up version of the Workgroup consultation document. The proposed version of OC3 Schedule 1 appears to be the schedule relating to RfG (GC0107) rather than to the DCC.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p>No. A Workgroup member has drafted two alternatives and we believe that both of those alternatives are preferable to the original proposal. However, neither is as good as the baseline, as the existing provisions in the Grid Code better facilitate Grid Code objectives d) and e).</p>

Specific questions for GC0113

Q	Question	Response
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Q	Question	Response
5	Do you believe that the obligation to track variations from standard parameters should be placed on the 14 ¹ Distribution Network Operators (DNOs) (as opposed to just the ESO) for providers of Demand Side Response, and do you believe the obligation should also be extended to the 13 ² Independent DNOs (IDNOs) for Demand Side Response connected to their networks? In this latter case, how do you think the obligation on the IDNOs should be imposed?	If the modification proposal is approved, we believe that it should apply equally to all licenced distribution network operators i.e. to both DNOs and IDNOs. However, as set out above, we are of the view that this proposal should not be approved.
6	This modification imposes a new requirement on DNOs for them to share some limited settings and requirements from individual providers of Demand Side Response agreements with the ESO in an anonymous form or with Ofgem (if they request it). Do stakeholders have any views on this, and in particular how providers of Demand Side Response can be made appropriately aware of the proposal?	No comment.
7	How often should the additional settings and requirements be a) updated and b) published following bilateral agreement between network operator and User of site specific values – daily, weekly, monthly, quarterly, six monthly, annually?	Given the limited value of this information, this information should be provided annually, as part of the Week 24 submission.

¹ Eastern Power Networks Plc; Electricity North West Limited; London Power Networks Plc; Northern Powergrid (Northeast) Limited; Northern Powergrid (Yorkshire) Plc; Scottish Hydro Electric Power Distribution Plc; South Eastern Power Networks Plc; Southern Electric Power Distribution Plc; SP Distribution Plc; SP Manweb Plc; Western Power Distribution (East Midlands) Plc; Western Power Distribution (South Wales) Plc; Western Power Distribution (South West) Plc; and, Western Power Distribution (West Midlands) Plc.

² Energy Assets Networks Limited; Energetics Electricity Limited; ESP Electricity Limited; Fulcrum Electricity Assets Limited; G2 Energy IDNO Limited; Harlaxton Energy Networks Limited; Independent Power Networks Limited; Leep Electricity Network Limited; Murphy Power Distribution Limited; The Electricity Network Company Limited; UK Power Distribution Limited; Utility Assets Limited; Vattenfall Network Limited according to the public list on Ofgem's website <https://www.ofgem.gov.uk/electricity/distribution-networks/connections-and-competition/independent-distribution-network-operators>

Q	Question	Response
8	How do you feel you will benefit from this proposed modification – please quantify benefit where possible?	There are no benefits to the DNOs. We are keen to understand from demand side response providers and developers the ways in which they believe this modification proposal would be of benefit.
9	What costs and/or risks do you believe would arise from implementing this proposed modification – please quantify these where possible?	<p>To implement the proposal we would need to develop, introduce and operate a new system to record the small number of relevant settings / requirements so that they are accessible to the team managing demand side response arrangements.</p> <p>In our view, once the demand side response market has developed settings / requirements, they would only need to be changed on rare occasions, so giving rise to the possibility that those involved with and/or responsible for the reporting may overlook the requirement or that reporting is submitted late. This will expose the DNOs to the risk of non-compliance with a code requirement and, therefore, with the distribution licence. The administrative procedures that will have to be implemented in order to manage this risk will be significantly disproportionate to any benefit that may accrue from the proposal.</p>
10	The code mapping spreadsheet produced as part of the GB implementation of the European Connection Codes (RfG, DCC and HVDC) includes all Grid Code references where settings required by DCC were made. An ENTSO-E implementation monitoring spreadsheet ³ has also been produced showing the settings made in each member state. What additional value does this modification proposal deliver?	We are of the view that the GB Implementation Code Mapping and publication of the Grid Code, together with the ENTSO-E implementation monitoring spreadsheet, provides sufficiency clarity regarding the vast majority of the settings and requirements with which a developer needs to comply. There are 4 DNO-related settings and requirements, which are likely, once the market has been established, to be site-specific. Consequently, it is our view that this modification proposal will not deliver any additional value or benefit.

³ ENTSO-E implementation monitoring spreadsheet can be found at:
https://docstore.entsoe.eu/layouts/15/download.aspx?SourceUrl=https://docstore.entsoe.eu/Documents/Network%20codes%20documents/CNC/CNC_Non_exhaustive_requirements.xlsm

Q	Question	Response
11	<p>How do you believe the template, which is being consulted on in spreadsheet form (Annex 2) for convenience should be incorporated into the Grid Code legal text? The options include converting it into a plain document table and including it in the Data Registration Code in line with all other formal data requirements, or somehow referring in the legal text to governed version of the spreadsheet. The Workgroup would be pleased to hear views on the balance of the certainty and rigour of the governance of the requirements versus simplicity?</p>	<p>The large spreadsheet proposed by the Workgroup in Annex 2 should ideally be presented in a Word-based tabular form. It would be a Grid Code requirement for NGESO to complete the table, so it should be included as Grid Code legal text to be consistent with other Grid Code obligations. If the spreadsheet functionally is described, rather than included in the legal text, it would be open to be changed outside normal Grid Code Governance.</p>
12	<p>Do you agree that this requirement should be drafted as a new Grid Code section (i.e. OC3) or would it be better to accommodate in the Planning Code alongside similar data?</p>	<p>The Planning Code 'specifies the technical and design criteria and procedures', whilst the Operating Code is 'concerned with the Demand forecasting for operational purposes.....in order to match generation output with demand'. Consequently, the Planning Code would be a more sensible place to accommodate any new obligation relating to RfG and it would make sense to document the DCC requirements in the same place.</p>