

Grid Code Alternative and Workgroup Vote

GC0131: 'Quick Win' Improvements to Grid Code Open Governance Arrangements

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 1 - Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative Code Modifications.

Stage 2 - Workgroup Vote

2a) Assess the original and WAGCMs (if there are any) against the Grid Code objectives compared to the baseline (the current Grid Code).

2b) If WAGCMs exist, vote on whether each WAGCM better facilitates the Applicable Grid Code Objectives better than the Original Modification Proposal.

2c) Vote on which of the options is best.

The Applicable Grid Code Objectives are:

- a) *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;*
- b) *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);*
- c) *Subject to sub-paragraphs (a) and (b), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national; and*
- 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. In conducting its business, the Workgroup will at all times endeavour to operate in a manner that is consistent with the Code Administration Code of Practice principles.*
- e) *To promote efficiency in the implementation and administration of the Grid Code arrangements.*

Workgroup Vote

Stage 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative Code Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chairman believe that the potential alternative solution would better facilitate the Grid Code objectives then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative Code modification (WAGCM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

“Y” = Yes

“N” = No

“-“ = Neutral

Workgroup Member	Alternative 1 (Drax Generation Enterprise Limited, WAGCM 1 <<GR 20.1>> Baseline retention)
Alan Creighton	Yes
Alastair Frew	Yes
Garth Graham (Andrew Colley)	Yes
Richard Woodward	Yes
Rob Wilson	Yes
WAGCM1	

Stage 2a – Assessment against objectives

To assess the original and WAGCMs against the Grid Code objectives compared to the baseline (the current Grid Code).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

AGCO = Applicable Grid Code Objective

	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Workgroup Member	Alan Creighton - Northern Powergrid					
Original	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes
WAGCM1	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes
Voting Statement:						
<p>The Original and the WAGCM would both improve the efficient development of modifications by clarifying the process and providing additional governance flexibility. The Original Proposal seeks to change the fundamental test in the assessment of an Alternative in that the Alternative would be compared against the Original Proposal rather than the Grid Code baseline. It is unclear what the defect is that the Original Proposal addresses in this area and there is the possibility that it could adversely affect the principles of Open Governance. For this reason the WAGCM is the best option.</p>						

	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Alastair Frew - Drax Generation Enterprise Limited					
Original	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	No	Yes	Yes
WAGCM1	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes
Voting Statement:						
<p>Whilst I agree with most of the changes proposed in the original modification proposal, I think the original modification proposal will limit the opportunity to raise alternative modification proposals and goes against the principles of open governance, the alternative modification proposal introduces most of the changes and retains the current arrangements for alternative modification proposals.</p>						

	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Garth Graham - SSE Generation Ltd (Andrew Colley)						
Original	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes
WAGCM1	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes

Voting Statement:

Both the original and the alternative are an improvement to the baseline by implementing efficiency improvements to the Code modification process.

Notwithstanding the proposer’s view on compliance with licence conditions, WAGCM1 provides for a more comprehensive set of alternatives to be developed and presented for decision than the original proposal, which would unnecessarily limit the workgroup in this respect and could result in the failure to develop and present legitimate options as a solution to the problem at hand.

WAGCM1 therefore provides the optimum solution to address the defects identified in the modification proposal.

	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Richard Woodward - National Grid Electricity Transmission						
Original	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes
WAGCM1	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes

Voting Statement:

Both proposals are an improvement on the baseline. Whilst I understand the proposer’s view on clause GC 20.15, I believe the baseline on this specific point (as per WAGCM1) presents a more comprehensive assessment of alternative mod proposals. It avoids the unforeseen consequence of legitimate WAGCMs being inadvertently dismissed by workgroups.

	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Rob Wilson - National Grid Electricity System Operator/Proposer						
Original	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	Yes	Yes	Yes
WAGCM1	<i>Neutral</i>	<i>Neutral</i>	<i>Neutral</i>	No	Yes	Yes

Voting Statement:

Both the original and the alternative are an improvement on the baseline in making various changes to improve the efficiency of the code modification process. In terms of the small difference between them, I understand the misgivings expressed in the workgroup that the original could limit the assessment of alternatives. Legally though I think that the original is actually correct in being aligned with the requirements set out in the Transmission Licence Conditions and that this is currently misinterpreted in both the Grid Code and CUSC, although being correctly interpreted (as in the original proposal) in the BSC.

Stage 2c – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal))

Workgroup Member	Company	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Alan Creighton	Northern Power Grid	WAGCM1	E
Alastair Frew	Drax Generation Enterprise Ltd	WAGCM1	E
Garth Graham (Andrew Colley)	SSE Generation Ltd	WAGCM1	E
Richard Woodward	National Grid Electricity Transmission	WAGCM1	E
Rob Wilson	National Grid Electricity System Operator/Proposer	Original	D E