






Alternative Request Proposal Form	At what stage is this document in the process?
<p>Modification potential alternative submitted to:</p> <h1 data-bbox="172 389 1075 479">GC0131- WAGCM1</h1> <h2 data-bbox="172 517 986 725">'Quick Win' Improvements to Grid Code open governance arrangements</h2>	<div data-bbox="1185 309 1257 389">01</div> <div data-bbox="1267 309 1484 389">Proposed Alternative</div> <div data-bbox="1185 421 1257 501">02</div> <div data-bbox="1267 421 1484 501">Proposed Workgroup Alternative</div>
<p><b>Purpose of Alternative:</b> To ensure open and fair rights to all parties to raise alternative proposals.</p>	
<p><b>Date submitted to Code Administrator:</b> 15-05-2020</p> <p><b>You are:</b> A Workgroup member</p> <p><b>Workgroup vote outcome:</b> Formal alternative – WAGCM1</p>	

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4 Impacts and Other Considerations	 07773 043068
5 Implementation	Alternative Proposer: Alastair Frew
6 Legal Text	 <a href="mailto:Alastair.Frew@drax.com">Alastair.Frew@drax.c om</a>
	 07730 697290

## 1 Alternative proposed solution for workgroup review

Whilst agreeing with most of the Original proposal of GC0131 there is one area of concern which relates to the assessment of alternative proposals. As proposed this modification would change the assessment criteria for alternatives and restrict alternative proposals to only being allowed if they are better than the original as opposed to the current situation where they are assessed against the baseline. This therefore will limit the possibilities of alternatives and give the Originator a dominant position limiting openness and restricting consideration of other feasible options.

Equally not clear that this change is allowed under the provisions for alternatives as set out in the Transmission Standard Licence Conditions for the Grid Code (C14) as presented below:

“C14.2A. The licensee shall establish and operate procedures for the modification of the Grid Code (including procedures for modification of the modification procedures themselves), so as to better facilitate achievement of the applicable Grid Code objectives, which procedures shall provide:

(v) for the development and consideration of any alternative modification which **may**, as compared with the proposed modification, better facilitate achieving the applicable Grid Code objective(s) provided that:

- the alternative proposal is made as described in the Code of Practice and as further specified in the Grid Code; and –

unless an extension of time has been approved by the panel and not objected to by the Authority after receiving notice, any workgroup stage shall last for a maximum period (as specified in the Grid Code) from the date on which the original modification was proposed,”

The key word in this licence requirement is “may”, highlighted in yellow, which we believe does not mandate that a potential alternative has to be better than the Original proposal and hence can still be taken forward for consideration. As written this Original proposal removes the option for some alternative to be taken forward and this Alternative proposal keeps this route available to parties going forward.

## 2 Difference between this proposal and Original

The difference between this proposal and the Original proposal is this proposal will leave section GR20.15 as per the baseline. The Original proposal changes 20.15 as follows:-

Note that as the alternative incorporates all other changes from the original the paragraph number will change from GR.20.15 to GR.20.18.

GR.20.1845 If a majority of the members of the **Workgroup** or the chairman of the **Workgroup** believe that the **Workgroup Consultation Alternative Request** ~~may~~**will** better facilitate the **Grid Code Objectives** than the ~~current version of the Grid Code Modification Proposal~~, the **Workgroup** shall develop it as a **Workgroup Alternative Grid Code Modification(s)** or, where the chairman of the **Workgroup** agrees, amalgamate it with one or more other draft **Workgroup Alternative Grid Code Modification(s)** or **Workgroup Consultation Alternative Request(s)**;

This alternative would leave this section as per the base line as follows:-

GR.20.1845 If a majority of the members of the **Workgroup** or the chairman of the **Workgroup** believe that the **Workgroup Consultation Alternative Request** will better facilitate the **Grid Code Objectives** than the current version of the **Grid Code**, the **Workgroup** shall develop it as a **Workgroup Alternative Grid Code Modification(s)** or, where the chairman of the **Workgroup** agrees, amalgamate it with one or more other draft **Workgroup Alternative Grid Code Modification(s)** or **Workgroup Consultation Alternative Request(s)**;

## 3 Justification for alternative proposal against Grid Code objectives

### Impact of the modification on the Applicable Grid Code Objectives:

Relevant Objective	Identified impact
(i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Positive
(ii) 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	Positive

generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	
(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;	Positive
(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	Positive
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive

This alternative will keep the current arrangements of treatment of alternative proposals unchanged and continue to allow open and fair access for parties to raise alternatives. All other parts of the Original proposal are unchanged .

## 4 Impacts and Other Considerations

The same as the original proposal.

### Consumer Impacts

The same as the original proposal.

## 5 Implementation

The same implementation requirements apply as per the original proposal.

## 6 Legal Text

Same as original except GR20.15 will remain as per the base line.

GR.20.15

If a majority of the members of the **Workgroup** or the chairman of the **Workgroup** believe that the **Workgroup Consultation Alternative Request** will better facilitate the **Grid Code Objectives** than the current version of the **Grid Code**, the **Workgroup** shall develop it as a **Workgroup Alternative Grid Code Modification(s)** or, where the chairman of the **Workgroup** agrees, amalgamate it with one or more other draft **Workgroup Alternative Grid Code Modification(s)** or **Workgroup Consultation Alternative Request(s)**;