

**CUSC/Grid Code Code Administrator Consultation Response  
Proforma****GC0131: 'Quick Win' Improvements to Grid Code open governance  
arrangements**

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 to [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com) by **5pm on 27 August 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Panel.

If you have any queries on the content of this consultation, please contact Nisar Ahmed - [Nisar.Ahmed@nationalgrideso.com](mailto:Nisar.Ahmed@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Rob Wilson
<b>Company name:</b>	NGESO
<b>Email address:</b>	robert.wilson2@nationalgrid.com
<b>Phone number:</b>	07799 656402

**For reference the applicable Grid Code objectives are:**

- i.* To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity
- 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 generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);
- iii.* Subject to sub-paragraphs (a) and (b), 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;
- 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
- v.* To promote efficiency in the implementation and administration of the Grid Code arrangements

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Grid Code Original Proposal or WAGCM1 better facilitates the Grid Code/ Applicable CUSC Objectives?	Both the original and WAGCM1 better facilitate objective (v) in improving the administration and efficiency of the Grid Code arrangements. In facilitating a more efficient code modification process and removing blockers they will also help in the development of the system so improving objective (i).
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>Firstly I'd like to thank the workgroup for their engagement in developing these proposals and in agreeing a set of positive changes that will really help in progressing code modifications.</p> <p>There was only one area where the group could not agree which then led to the WAGCM, which was based on a difference in legal interpretation around the treatment of alternatives. NGESO's opinion is that as set out in the standard licence conditions whether an alternative is developed by a workgroup or not should be based on whether it may better meet the Grid Code objectives than the original proposal:</p> <p><i>Transmission Standard Licence Conditions C14.2A:</i></p> <p><i>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:</i></p> <p><i>(v) for the development and consideration of any alternative modification which may, <b>as compared with the proposed modification</b>, better facilitate achieving the applicable Grid Code objective(s)...</i></p> <p>This view is also how the licence conditions are reflected in the BSC section F:</p> <p><i>2.6.4 The Workgroup shall:</i></p>

	<p><i>(a) evaluate the Modification Proposal for the purpose set out in paragraph 2.6.2;</i></p> <p><i>(b) where appropriate, develop an alternative proposed modification (the "Alternative Modification") which, <b>as compared with the Proposed Modification</b>, would better facilitate achievement of the Applicable BSC Objective(s);</i></p> <p>The Grid Code and CUSC appear to in error instead require the assessment to be against the baseline. The original corrects this while WAGCM1 retains the test to be against the baseline as it is currently.</p>
--	---