

Grid Code Workgroup 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 by **5pm on 29 April 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact **Nisar Ahmed** Nisar.Ahmed@nationalgrideso.com or grid.code@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Alan Creighton
Company name:	Northern Powergrid
Email address:	alan.creighton@northernpowergrid.com
Phone number:	07850 015515

For reference the applicable Grid Code objectives are:

- Implementation;
- Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text;
- Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup;
- Be mindful of impact with CUSC; and
- Consider where removal of 1 or more components will facilitate treatment of the Modification as Quick Wins.

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

Standard Workgroup Consultation questions		
1	Do you believe that the GC0131 Original Proposal better facilitates the Applicable Grid Code Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	<p>Most of the proposed changes will help to address some of the issues that have been experienced progressing Grid Code modifications under the open governance arrangements, and we support these.</p> <p>The exception is the proposed change to the consideration of Workgroup Consultation Alternative Requests in GR.20.15 which we think could be material and needs further consideration once the defect has been clarified. In the past some WAGCMs have been developed, causing additional pressure on industry resource, which under this proposed change may not have been developed.</p> <p>Whilst the proposed treatment of WAGCMs may align with the BSC, it doesn't align with CUSC. The proposal is aligned to the transmission licence to some extent; one difference is the transmission licence uses the phrase 'may...better facilitate', whereas the proposal uses the phrase 'will...better facilitate.</p> <p><i>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:</i></p> <p><i>(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:</i></p> <p>It could be difficult to determine whether a WAGCM</p>

		<p>'will better facilitate the GCode objectives' until both the Original Proposal and WAGCM have both been developed to a stage where they are clearly understood.</p> <p>As drafted the change relates to a Workgroup Consultation Alternative Request, whereas a Workgroup Alternative Grid Code Modification may be put forwards at any stage in the workgroup process. Assuming there is a defect to be addressed, the proposed change may not be sufficient.</p> <p>There is also a lack of alignment with the definition of a WAGCM where the test is that a WAGCM should better facilitate the Grid Code Objectives than either the existing Grid Code or the proposal.</p> <p>We have also identified several minor typographical errors and points of clarification on a marked up version of the draft legal text.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No