

Grid Code Administrator Consultation Response Proforma

GC0136: Non-material changes to the Grid Code following implementation of the EU Connection Codes.

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **17:00** on **13 May 2020** to grid.code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be addressed to Nisar Ahmed at Nisar.Ahmed@nationalgrideso.com

These responses will be included within the Draft Grid Code Modification Self Governance Report to the Grid Code Panel and within the Final Grid Code Modification Self Governance Report to the Authority.

Respondent:	<i>Antony Johnson</i>
Company Name:	<i>National Grid ESO</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity(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);(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 system operator area taken as a whole;(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally

	<p>binding decisions of the European Commission and/or the Agency; and</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p>
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Code Administrator Consultation questions

Q	Question	Response
1	<p>Do you believe GC0136 better facilitates the Applicable Grid Code Objectives? Please include your reasoning.</p>	<p>Yes.</p> <p>GC0136 better facilitates all five applicable Grid Code Objectives by removing errors, improving accuracy and making the text clearer and easier to understand for Users. Whilst none of the individual changes are material, there are numerous non-material changes being proposed, and together they will make a significant improvement to the accuracy and clarity of the Grid Code as a whole.</p>
2	<p>Do you support the proposed implementation approach?</p>	<p>Yes.</p> <p>We recommend that this is implemented sooner rather than later. It impacts many areas of the Grid Code, so it is advisable to implement these changes as soon as possible, to avoid any unnecessary confusion between different versions of the code.</p> <p>Since they are so widespread, care will need to be taken in implementing these changes. Panel should ask the Code Administrator to ensure that the changes are made to the baseline at the time that the mod is approved and thereafter that care is also taken to apply the changes from any modification that is in progress to the baseline as corrected through GC0136.</p>

Q	Question	Response
3	<p>Do you have any other comments in relation to GC0136?</p>	<p>Since the Code Administrator Consultation was published, we have identified some errors relating to the inadvertent inclusion of the term 'Electricity Storage Module' which occurs in the following sections of the Grid Code.</p> <p>Glossary and Definitions – Electricity Storage, Electricity Storage Module, Non-Synchronous Electricity Storage Module, Synchronous Electricity Storage Module and Synchronous Electricity Storage Unit</p> <p>ECC.1.1(c)(iv) and ECC1.1(d), ECC.3.1(a), ECC3.6, ECC.6.3.1, ECC.6.3.3.1.1(b) and Title of Figure ECC.6.3.3(a)</p> <p>OC6.6.6(a) and OC6.6.6(b)</p> <p>We suspect that these were inadvertently introduced when GC0127 and GC0128 were implemented due to the potential dependency with GC0096 which has not yet been implemented.</p>