

Grid Code Alternative and Workgroup Vote**GC0147: Last Resort Disconnection of Embedded Generation – enduring solution**

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 Grid Code Modifications (WAGCMs).

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:

- 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 binding decisions of the European Commission and/or the Agency; and
- 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 Grid 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 than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative Grid 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 (NGESO – Rob Wilson)	Alternative 2 (NGESO – Rob Wilson)	Alternative 3 (SSE, Garth Graham)	Alternative 4 (E.ON Matthew Cullen)
Andrew McLeod	Y	Y	Y	Y
Andrew Vaudin				
Brian Morrissey				
Fungai Madzivadondo				
Garth Graham	Y	Y	Y	Y
Graham Bone	Y	Y	Y	Y
Grant Mcbeath	Y	Y	Y	Y
Graz Macdonald				
Isaac Gutierrez				
Jack Presley Abbott				
Jeremy Caplin	Y	Y	Y	Y
John Smart	Y	Y	Y	Y
Mark Meyrick				
Matthew Cullen	Y	Y	Y	Y
Paul Graham	Y	Y	Y	Y
Paul Youngman				
Phil Smith				
Richard Wilson	Y	Y	Y	Y
Robert Longden				
Rob Wilson	Y	Y	Y	Y
	WAGCM 1	WAGCM 2	WAGCM 3	WAGCM 4

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

Andrew McLeod	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Andrew McLeod – Northern Power Grid						
Original	-	-	Y	-	-	Y
WAGCM 1	-	-	-	-	-	-
WAGCM 2	-	-	Y	-	-	Y
WAGCM 3	-	-	-	-	-	-
WAGCM 4	-	-	-	-	-	-
WAGCM 5	-	-	-	-	-	-
WAGCM 6	-	-	-	-	-	-
WAGCM 7	-	-	-	-	-	-

Voting Statement:

Northern Powergrid will support both the original and alternative 2 with a preference for alternative 2 which recognised more closely the issues raised in the workgroup meetings. Northern Powergrid believe alternative 2 is a better representation of the current position for customers connected to the Distribution Network, who do not have or pay for a guarantee of continuous availability. Embedded generation customers should therefore be treated the same as other customers who would not be entitled to compensation in the event of de-energisation in a system emergency.

In the event that such an emergency situation arises more than once in any 12 month period, this would be an indication that the facility may not be being used as a last resort and the Grid Code Review Panel should consider the implications even though any subsequent changes may not be in the Grid Code, but in other codes more applicable to compensation arrangements.

The requirement for DNOs to capture data to enable any future compensation arrangements to be applied retrospectively will ensure that sufficient time is available to develop a robust process.

Brian Morrissey	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Brian Morrissey - SHEPD						
Original	Yes	Neutral	Yes	Neutral	Yes	Yes
WAGCM 1	Yes	Yes	Yes	No	No	No
WAGCM 2	Yes	Neutral	Yes	No	Yes	Yes

WAGCM 3	Neutral	No	Neutral	Neutral	No	No
WAGCM 4	Yes	Yes	Neutral	No	No	No
WAGCM 5	Yes	Yes	Yes	Yes	No	No
WAGCM 6	Yes	Yes	Yes	Yes	No	No
WAGCM 7	Yes	Neutral	Neutral	Neutral	No	No

Voting Statement:

The last resort disconnection of generation is in our view a method to preserve the system from total failure. We believe that NG ESO must have the ability to utilise all the tools available, market based and others to prevent a complete loss of the system. Our view is that generators have, in many cases a single, non-firm connection to the system and compensation should not be paid in line with normal practice for demand customers. LFDD, OC6 are already well-established tools available to the ESO and demand customers are not consequentially compensated during these stages. We believe that WAGCM 2 gives the ESO the right tools to balance the system in a fair and transparent way and that generation customers have the right to challenge if this option was used more than required.

Garth Graham	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					
Original	neutral	No	Yes	No	neutral	No
WAGCM 1	neutral	Yes	Yes	Yes	neutral	Yes
WAGCM 2	neutral	No	Yes	No	neutral	No
WAGCM 3	neutral	Yes	Yes	Yes	neutral	Yes
WAGCM 4	neutral	Yes	Yes	No	neutral	No
WAGCM 5	neutral	Yes	Yes	Yes	neutral	Yes
WAGCM 6	neutral	Yes	Yes	No	neutral	No
WAGCM 7	neutral	Yes	Yes	Yes	neutral	Yes

Voting Statement:

I understand the security of supply arguments that have been made for this Original proposal (and upon which the alternatives draw) and I concur that all eight options are, accordingly, better in terms of Applicable Objective (c). In respect of Applicable Objectives (a) and (e) all eight options are neutral.

Taking each option in turn, the Original because it fails to address the EU legal requirements in respect of compensation to be paid according to Article 13 is neither better in terms of Applicable Objective (b) or (d) and overall these negative attributes outweigh the positive attributes in terms of (c).

WAGCM 1 is an improvement on the Original in terms of the matter of compensation and therefore is better in terms of Applicable Objective (b) and (d) as well as overall.

WAGCM 2 because it fails to address the EU legal requirements in respect of compensation to be paid according to Article 13 is neither better in terms of Applicable Objective (b) or (d) and overall these negative attributes outweigh the positive attributes in terms of (c).

WAGCM 3 is an improvement on the Original in terms of the matter of compensation and therefore is better in terms of Applicable Objective (b) and (d) as well as overall.

WAGCM4 (like those for 5, 6 and 7) takes the Original (and 1, 2 and 3) and provides greater certainty that in terms of competition means this option better meets the applicable objective (b). However, it fails to address the EU legal requirements in respect of compensation to be paid according to Article 13 and is therefore not better in terms of Applicable Objective (d) and overall the negative attribute outweigh the positive attributes in terms of (b) or (c).

WAGCM5 (as noted under 4 above) shares some common attributes and provides greater certainty that in terms of competition means this option better meets the applicable objective (b). It builds upon WAGCM1 and is an improvement on the Original in terms of the matter of compensation and therefore is better in terms of Applicable Objective (b) and (d) as well as overall.

WAGCM6 (as noted under 4 above) shares some common attributes and builds upon WAGCM2 and provides greater certainty that in terms of competition means this option better meets the applicable objective (b). However, it fails to address the EU legal requirements in respect of compensation to be paid according to Article 13 and is therefore not better in terms of Applicable Objective (d) and overall the negative attribute outweigh the positive attributes in terms of (b) or (c).

WAGCM7 (as noted under 4 above) shares some common attributes and provides greater certainty that in terms of competition means this option better meets the applicable objective (b). It builds upon WAGCM3 and is an improvement on the Original in terms of the matter of compensation and therefore is better in terms of Applicable Objective (b) and (d) as well as overall.

Graham Bone	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Graham Bone – Infinis					
Original	-	N	Y	-	-	N
WAGCM 1	-	N	Y	-	-	N
WAGCM 2	-	N	Y	-	-	N
WAGCM 3	-	N	Y	-	-	N
WAGCM 4	-	N	Y	-	-	N
WAGCM 5	-	Y	Y	-	-	Y
WAGCM 6	-	N	Y	-	-	N
WAGCM 7	-	N	Y	-	-	N

Voting Statement:

WAGCM 5 Better captures the principle outlined by OFGEM which we support that this mechanism should be a last resort utilised only after commercial measures have been exhausted, having been developed on a permanent footing.

WAGCM5 also captures the requirement for compensation of disconnected Embedded Generation and the requirement for alignment with the DCUSA and CUSC.

Grant McBeath	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Grant McBeath – SP Energy Networks						
Original	Y	-	N	-	-	N
WAGCM 1	Y	-	N	-	-	N
WAGCM 2	Y	-	Y	-	Y	Y
WAGCM 3	Y	-	N	-	-	N
WAGCM 4	Y	-	N	-	-	N
WAGCM 5	Y	-	N	-	-	N
WAGCM 6	Y	-	N	-	-	N
WAGCM 7	Y	-	N	-	-	N

Voting Statement: SPEN vote for WAGCM2.

NRAPM's are rarely issued and the "Last Resort Disconnection of Generation" I believe would be an extremely rare event and only occurred in 2020 due to a combination of COVID lockdown, high distributed generation output and low demand over a bank holiday period. Despite this being a rare event NGESO still needs the ability to balance the system using ALL available assets, market participants or otherwise, to ensure the security of the network. In principle we don't believe Generators in an "emergency disconnection" event should be treated any differently to demand customers in an EMN event who do not get compensated for consequential loss should they be disconnected to balance the system. SPEN believe an ODFM replacement should be developed to minimise the risk of an "emergency disconnection". By implementing WAGCM 2 this should compel NGESO to ensure that "Last Resort Disconnection of Generation" is not used as a "no-cost" alternative to developing a replacement ODFM solution and compensation could be reconsidered and back-dated should it used more than once in a 12 month period.

Lisa Waters	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Lisa Waters – Waters Wye Associates						
Original	-	N	Y	N	-	N
WAGCM 1	-	N	Y	Y	-	Y
WAGCM 2	-	Y	Y	N	-	N
WAGCM 3	-	Y	Y	Y	-	Y
WAGCM 4	-	N	Y	N	-	N
WAGCM 5	-	Y	Y	Y	-	Y
WAGCM 6	-	Y	Y	N	-	N
WAGCM 7	-	Y	Y	Y	-	Y

Voting Statement: I remain very concerned that this is only part of a solution, with no associated change to the DCUSA to make sure that the process is an end to end process, including the way that the generation will be reinstated. Ofgem's decision on GC143 said that NGESO should develop an "enduring solution in consultation with industry". Instead they have failed to listen to the market and pushed ahead with a change only they are supportive of. As well as a failure to define a full solution, their two WACM3 allowing for compensation are too vague to offer any reassurance to embedded generators that they would be treated in an equitable manner to other sites (generation and demand) being curtailed in emergency situations.

Furthermore, NGESO's failure to bring forward a replacement to ODFM shows a contempt for the market, despite Ofgem approving GC143 on the basis that it clarified that interruption would be "as a last resort and only once all commercially available options have been exhausted by the ESO". The market not unreasonably expected NGESO to come forward with a replacement to ODFM to be used before emergency instructions are required. Instead, NGESO has come forward with only a command and control response, with no defined compensation level and has removed the commercial solution from the table.

The alternatives raised by other parties have tried to address the issues of compensation and, the need for a commercial service to be put in place. These are therefore better than the original change proposal, though still only address the instructions from ESO to DNO, but not how the rest of the process will work and how compensation would be paid. I therefore believe Ofgem should sign off none of the alternatives until they have a suite of changes in front of them to allow a decision on a coherent set of arrangements. A change that better facilitates the Grid Code Objectives may have a knock on effect on competition under the DCUSA and the CSUC that are detrimental to their operation.

My views on the specific options are:

- The original has no compensation and therefore is unduly discriminatory and detrimental to competition. I would approve none of the options until all of the regime, including compensation and a new ODFM has been finalised.
- WACM1 and WACM2 rely on mods that have not been raised to provide processes for compensation, but at least WACM1 would require NGESO to bring forward appropriate changes and pay in all events. The group has persistently urged NGESO to bring forward both a commercial service and further mods to create an end to end process with compensation.
- WACM3 does not define the compensation process, but make it clear that it is due. The fact this was raised was I assume in response to NGESO's failure to bring forward consequential changes.
- WACM4, based on the original needs compensation added and is therefore not acceptable.
- WACM5 has the same issue with no defined compensation, but would at least prompt more mods and add in ODFM.
- WACM6 has the issue of no proper compensation even with ODFM.
- WACM7 is the least worst solution, though still needs an ODFM service and a compensation mechanism.

On balance, I believe that of the alternatives presented WACM7 is the best option.

Mark Meyrick	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Mark Meyrick – Company Mark Meyrick Ecotricity						
Original	N	N	N	-	N	N
WAGCM 1	N	N	N	-	N	N
WAGCM 2	Y	Y	N	-	Y	Y
WAGCM 3	Y	N	Y	-	Y	Y
WAGCM 4	Y	Y	Y	-	Y	Y
WAGCM 5	N	N	N	-	N	N
WAGCM 6	Y	Y	Y	-	Y	Y
WAGCM 7	Y	Y	Y	-	Y	Y
Voting Statement: Preference for WAGCM 7 out of all of them						

Matthew Cullen - EON	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Matt Cullen – E.ON UK						
Original	Yes	No	Yes	No	-	No
WAGCM 1	Yes	Yes	Yes	Yes	-	Yes
WAGCM 2	Yes	No	Yes	No	-	No
WAGCM 3	Yes	Yes	Yes	Yes	-	Yes
WAGCM 4	Yes	No	Yes	No	-	No
WAGCM 5	Yes	Yes	Yes	Yes	-	Yes
WAGCM 6	Yes	No	Yes	No	-	No
WAGCM 7	Yes	Yes	Yes	Yes	-	Yes
Voting Statement: Compensation is the stumbling block for the original proposal, WAGCM2, WAGCM4 and WAGCM6. Without addressing this legal requirement (as I see it), I believe NGESO is opening itself up to unrestricted claims from embedded generations. For this reason, I believe that the Original proposal, WAGCM2, WAGCM4 and WAGCM6 do not better facilitate AGCO (d). Also, by failing to compensate embedded generators, these generators are put at a disadvantage compared to transmission connected generation who are guaranteed to receive BM prices under similar circumstances. Whilst I acknowledge that NGESO hope to have a market (such as ODFM v2) where generators who wish to participate can ensure payment for taking action, there is no guarantee (hence the need for WAGCM4-7) and this does not help generators who do not wish to be a part of the energy market. Therefore, I believe that the Original proposal, WAGCM2, WAGCM4 and WAGCM6 all do not better facilitate AGCO (b).						

Paul Graham	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
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	Paul Graham – Sembcorp Energy UK					
Original	N	N	N	N	-	N
WAGCM 1	N	N	N	N	-	N
WAGCM 2	N	N	N	N	-	N
WAGCM 3	N	N	Y	N	-	Y
WAGCM 4	N	N	N	N	-	N
WAGCM 5	N	N	N	N	-	N
WAGCM 6	N	N	N	N	-	N
WAGCM 7	N	N	Y	N	-	Y

Voting Statement: Whilst I believe that all the proposals give the ESO another ‘tool’ to manage the Transmission System in the event of an emergency event, the onus of responsibility, and hence compensation to affected embedded generators, should be on the ESO. My preference is for WAGCM 7 as this identifies a commercial compensation route for embedded generators.

Paul Youngman/Joshua Logan - DRAX	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Paul Youngman Drax					
Original	Negative	Negative	Negative	Negative	-	No
WAGCM 1	Negative	Negative	Negative	Neutral	-	No
WAGCM 2	Negative	Negative	Negative	Negative	-	No
WAGCM 3	Negative	Neutral	Positive	Positive	-	Yes
WAGCM 4	Negative	Negative	Negative	Negative	-	No
WAGCM 5	Negative	Neutral	Neutral	Neutral	-	No
WAGCM 6	Negative	Negative	Negative	Negative	-	No
WAGCM 7	Negative	Positive	Positive	Positive	-	Yes

Voting Statement:

Original:

The original proposal and all WACMs require implementation on a cross code basis to ensure the ‘What’ ‘How’ and ‘Who’ of the redispatch /curtailment is appropriately cascaded through all relevant codes. For this reason all options remain negative against AGCO(A).

As outlined in the Drax workgroup consultation response, the original proposal does not address the criticisms highlighted in GC0143 and the workgroup with respect to undermining competition and potentially distorting any market for services that may be used by the ESO prior to the issuing of the emergency instruction to a DN. It therefore fails to satisfy AGCO (B) and by inference AGCCO (C) as any improvement in security could be undermined by the lack of compensation and/or market arrangements. Against AGCO (D) the original is also negative as it does not appear to be compliant with aspects of the Clean Energy Package (Art 13.1 [based on non-discriminatory objective criteria](#) 13.2 [market based](#) and 13.7 [subject to financial compensation](#)).

The relative assessment of each of the alternatives is presented below.

WACM 1 – This alternative is neutral against AGCO (D) in that it at least accepts the principle that there should be compensation arrangements in CUSC and DCUSA. This conceivable could be the basis for a compliant solution, however it fails to provide any detail as how this would work. It is therefore incomplete and does not address the negative impact on competition so is negative against AGCO(B).

WACM 2 – This alternative would only apply compensation if parties flows were altered or curtailed multiple times in a year and if this is agreed to by the Grid Code panel. This does

not provide compliance with AGCO (D) and seems an inappropriate method of application. Again no detail is provided to demonstrate how compensation would be determined or distributed, or the governance arrangements for each of the panels. Applying such arrangements does not address the detrimental impact on competition and is negative against AGCO (B).

WACM 3- This alternative is positive against AGCO (C) and AGCO (D) as it applies the principles of Art 13 of the recast electricity directive, the Clean Energy Package, as the basis for compensation. There will still need to be corresponding modifications for CUSC and DCUSA to outline exactly how the compensation could operate but the principles are sound. Therefore, against AGCO (B) this alternative is neutral.

WACM 4 5 6 and 7 – Each of these alternatives provide an incentive to develop a market for ODFM and should provide a benefit over the 'original' alternative solutions that have been proposed. The major reservation is limited to the extent that development of the market mechanism is sufficient in scope and practicality to enable wide participation. It is also noted that the requirement to develop a market for ODFM does not address the compliance issue of providing financial redress for altering energy flows. However it could mitigate it being necessary in the first instance. This is reflected in the assessment against all the applicable objectives. This additional obligation is not enough to 'tip the dial' and make a previously negative assessment positive.

Conclusion

Implementation of either **WACM 3** or **WACM 7** would provide a benefit against the applicable grid code objectives.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Richard Wilson UK Power Networks					
Original	Y	-	Y	Y	Y	Y
WAGCM 1	Y	-	-	Y	Y	Y
WAGCM 2	Y	-	-	Y	Y	Y
WAGCM 3	Y	Y	-	Y	Y	Y
WAGCM 4	Y	Y	-	N	Y	-
WAGCM 5	Y	Y	-	N	Y	-
WAGCM 6	Y	Y	-	N	Y	-
WAGCM 7	Y	Y	-	N	Y	-

Voting Statement: Preferred option is WACM 1. This code change is to facilitate emergency actions for what should be very infrequent events. The ESO should be held accountable for compensation following event if it is shown that all practical commercial measures prior to the event had not be actioned. If compensation is agreed then consideration needs to be taken as to whether the ESO will use this as a means to not secure the system and rely on emergency instructions as this may be more efficient overall. The ESO cannot operate the system and ensure security of supply if the last resort disconnection cannot be used as specified in WACM4, 5, 6, 7 so if there is a risk of the market mechanism not being available when this is required will prevent the ESO securing the system. Once the market mechanism is in place then I would change the above stance to agree on WACM 7

Rob Wilson - ESO	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Name – Company					
Original	Neutral	Neutral	Positive	Neutral	Neutral	Y
WAGCM 1	Neutral	Neutral	Positive	Negative	Neutral	Y
WAGCM 2	Neutral	Neutral	Positive	Negative	Neutral	Y
WAGCM 3	Neutral	Neutral	Negative	Negative	Neutral	N
WAGCM 4	Neutral	Neutral	Negative	Negative	Neutral	N
WAGCM 5	Neutral	Neutral	Negative	Negative	Neutral	N
WAGCM 6	Neutral	Neutral	Negative	Negative	Neutral	N
WAGCM 7	Neutral	Neutral	Negative	Negative	Neutral	N

Voting Statement:

The ESO prefers the original.

A 'last resort' situation in which the ESO completely ran out of alternatives would be expected to occur with no more frequency than demand disconnections, so perhaps a 1 in 10-year risk at most. The ESO would always exhaust all viable commercial options first as they are easier to instruct and with a more assured result as well as being far more acceptable to stakeholders. Much more detail has been added to this enduring solution to minimise the impact and risk to stakeholders, to keep them better informed, and to prioritise keeping plant with serious or complex concerns connected. The 'last resort' is a necessary final line of defence and as such is not compatible with specific commercial arrangements which it serves as a backstop to when these have been exhausted and in our view is not a legal requirement of Article 13 of the CEP. Compensation would also be complex to achieve and could not be delivered by May 2021 when the solution needs to be in place.

WAGCMs 1 and 2 allow a route to future agreement of compensation and while inefficiently mitigating a minimal impact on stakeholders are still preferable to not delivering the modification at all due to the implications of this for system security.

WAGCM3 requires the ESO to sign a blank cheque for compensation and renders the last resort solution unusable as this would be paid from the ESO's bottom line with no funding agreed.

WAGCMs4-7 tie the availability of the 'last resort' to successful implementation of a commercial service. Our view is that regardless of the other commercial arrangements that are put in place, it is essential that the last resort ability to control embedded generation in an emergency is always available. This can't be compromised by making it conditional, particularly as Grid Code requirements once implemented will endure beyond any immediate arrangements.

Robert Longden	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Robert Longden – Cornwall Insight					
Original	Y	Neut	Y	Y	Neut	Y
WAGCM 1	Y	Neut	Y	Y	Neut	Y
WAGCM 2	Y	Neut	Y	Y	Neut	Y
WAGCM 3	Y	Neut	Y	Y	Neut	Y
WAGCM 4	Y	Neut	Y	Y	Neut	Y
WAGCM 5	Y	Neut	Y	Y	Neut	Y
WAGCM 6	Y	Neut	Y	Y	Neut	Y
WAGCM 7	Y	Neut	Y	Y	Neut	Y

Voting Statement: All options provide an enduring solution. Compensation needs to be properly defined in the solution and arrangements put in place before any event (no matter how infrequent it might be). As such those alternatives which more clearly define this area are preferred. Alt 3, 4, 5, 6, 7. The “best” is Alternative 3

Stage 2b – WAGCM Vote (If required)

Where one or more WAGCMs exist, does each WAGCM better facilitate the Applicable Grid Code Objectives than the Original Modification Proposal?

Workgroup Member	Company	WAGCM 1 better than Original Yes/No	WAGCM 2 better than Original Yes/No	WAGCM 3 better than Original Yes/No	WAGCM 4 better than Original Yes/No	WAGCM 5 better than Original Yes/No	WAGCM 6 better than Original Yes/No	WAGCM 7 better than Original Yes/No
Andrew McLeod	Northern Power Grid	No	Yes	No	No	No	No	No
Brian Morrissey	SHEPD	No	Yes	No	No	No	No	No
Garth Graham	SSE	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Graham Bone	Infinis	No	No	No	No	Yes	No	No
Grant McBeath	SPEN	No	Yes	No	No	No	No	No
Lisa Waters	Waters Wye Associates	Yes	No	Yes	No	Yes	No	Yes
Mark Meyrick	The Renewable Energy Company	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Matthew Cullen	EON	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Paul Graham	Sembcorp	No	No	Yes	No	No	No	Yes
Paul Youngman/Joshua Logan	DRAX	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Richard Wilson	UK Power Networks	Yes	Yes	No	No	No	No	No
Rob Wilson	ESO	No	No	No	No	No	No	No
Robert Longden	Cornwall Insight	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Stage 2c – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WAGCM1 or WAGCM2)

Workgroup Member	Company	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Andrew McLeod	Northern Power Grid	WAGCM2	C
Brian Morrissey	SHEPD	WAGCM2	A,C,E
Garth Graham	SSE	WAGCM3	B,C,D
Graham Bone	Infinis	WAGCM1	C
Grant McBeath	SPEN	WAGCM2	A,C,E
Lisa Waters	Waters Wye Associates	WAGCM7	B,C,D
Mark Meyrick	The Renewable Energy Company	WAGCM7	A,B,C,E
Matthew Cullen	EON	WAGCM7	A,B,C,D
Paul Graham	Sembcorp	WAGCM7	C
Paul Youngman/Joshua Logan	DRA X	WAGCM7	B,C,D
Richard Wilson	UK Power Networks	WAGCM2	A,D,E
Rob Wilson	ESO	Original	C
Robert Longden	Cornwall Insight	WAGCM3	A,C,D

Of the 13 votes, how many voters said this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	1
WAGCM1	1
WAGCM2	4
WAGCM3	2
WAGCM4	0
WAGCM5	0
WAGCM6	0
WAGCM7	5