

Workgroup Consultation Response Proforma**GC0144: Alignment of Market Suspension Rights to the EU
Emergency and Restoration Code Article 35.1(b)**

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 Tuesday 5 January 2021**. 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 Jennifer Groome jennifer.groome@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Antony Johnson
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For reference the Applicable Grid Code Objectives are:

- 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*

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 GC0144 Original Proposal better facilitates the Applicable Objectives?	Yes, GC0144 is positive against Grid Code objectives (c) and (d). While GC0144 makes only minor changes to achieve correct alignment and improve clarity, in helping to clarify the arrangements for market suspension and TERRE suspension, there will be some improvement to system security in such an event. Grid Code objective (d) will be more clearly aligned with the requirements of the Emergency and Restoration European Network Code (which will also be retained in EU Law) so correct and efficient implementation of an area of the law is achieved in the GB Grid code.
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	We fully support the approach and believe it provides i) better transparency between the EU Emergency and Restoration Code and GB Grid Code and ii) we support the additional clarity provided by the TERRE market suspension rules. Overall we believe this provides better clarity to all stakeholders participating in the Balancing Mechanism and TERRE market.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No
Modification Specific Workgroup Consultation questions		
5	Do you believe it is appropriate to adopt similar Market Suspension rules that are currently used for the Balancing Mechanism for TERRE Market Suspension? If not, please state your reasons and suggest a different approach.	Yes

6	Do you believe it is appropriate to use the same approach proposed for TERRE Market Suspension for MARI Market Suspension? If not, please state your reasons and suggest a different approach.	Yes. We also believe that MARI Market Suspension arrangements (which would be consistent with TERRE Market Suspension) should be progressed through Grid Code Modification GC0145 and P407.
7	Do you believe the proposals for TERRE market suspension are reasonable, particularly in respect of the notifications to Users and the time upon which they have to act before the TERRE market is re-established? If not, please state your reasons and suggest a different approach.	Yes