

Workgroup Consultation Response Proforma**GC0109: Publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc. ("System Warning Alerts") issued by or to the Network Operator(s).**

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 16 December 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 Paul Mullen at paul.j.mullen@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Joshua Logan
Company name:	Drax Group Plc
Email address:	Joshua.Logan@drax.com
Phone number:	07934296838

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 GC0109 Original solution better facilitates the Applicable Objectives?	<p>Yes, we believe the GC0109 original solution better facilitates the Applicable Objectives.</p> <p>Applicable Objective (b) – Positive</p> <p>GC0109 will introduce additional transparency of GB electricity system warnings and alerts. All markets participants will have access to this additional information in an equal and timely fashion. Such warnings / alerts can impact on market participants trading decisions. It's widely accepted that additional transparency promotes efficiency in markets and supports effective competition.</p> <p>Applicable Objective (d) – Positive</p> <p>The benefits of transparency are referenced in various EU codes and publications by Acer, ENTSOE and the EU Commission.</p> <p>Article 3(2) of the European Balancing Guidelines (EBGL) states that relevant National Regulatory Authorities (i.e. Ofgem) and System Operators should aim to foster effective competition and transparency in balancing markets. GC0109 will promote compliance with various aspects of EU electricity regulation.</p> <p>Applicable Objective (e) - Positive</p> <p>Currently, some warnings and alerts are published, and others aren't. Those that are published sometimes use different platforms and have different publication timescales. This proposal will capture all relevant alerts and introduce a homogeneous method for publication. Therefore,</p>

		this proposal will promote efficiency in the implementation of the Grid Code arrangements.
2	Do you support the proposed implementation approach?	Yes, we support the implementation approach.
3	Do you have any other comments?	No.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No.
Modification Specific Workgroup Consultation questions		
5	The Workgroup have set out four categories for the proposed items to be classified (or not) as System Warning Alerts and have noted that Category 1 System Warning Alerts are already published. The Workgroup have proposed that the System Warning Alerts in Categories 2 and 3 will need to be published and are within the scope of GC0109 whilst System Warning Alerts in Category 4 are outside the scope of GC0109. Do you agree with the Workgroup's list and do you think there is any System Warning Alerts that needs to be included or excluded from publication? Please provide the rationale for your response.	We agree with the list and have not identified any additional warnings / alerts that should be published. We would welcome reassurance from the ESO that list captures all warnings / alerts.
6	The Workgroup have considered 4 different BMRS Implementation Options and agree that Options 1 and 2 only are suitable for the scope of GC0109. Which of Option 1 or Option 2 do you prefer?. Please provide the rationale for your response.	<p>Our preference is for Option 1. The current systems warning interface is the obvious place to publish warnings / alerts and is well known by market participants. Many market participants will have already signed up to receive the email notifications when a system warning is published on BMRS. This channel of communication is effective and would remain in place under Option 1.</p> <p>Option 2 proposes to extend the REMIT interface to include system warnings / alerts. We believe this could create some confusion and we would prefer the REMIT interface to</p>

		<p>remain solely for REMIT publications. This ensures there is no confusion or ambiguity regarding what is a REMIT publication and what is a system warning / alert.</p> <p>For the avoidance of doubt, we support GC0109 regardless of which implementation solution is taken forward but believe option 1 would be the most simple and effective.</p>
7	<p>The Proposer has suggested a time window of 15 minutes (on a reasonable endeavours basis) for the ESO to issue the System Warning Alert to ELEXON for publication on the BMRS; and a time window of 20 minutes (on a reasonable endeavours basis) from the ESO receiving the System Warning Alert to issue to ELEXON for publication on the BMRS. Do you agree that these time windows are suitable? Please provide the rationale for your response.</p>	<p>Yes, 20 minutes from the decision being made by the ESO to publication on BMRS is reasonable.</p> <p>We encourage the ESO to issue the alert to ELEXON as soon as practicably possible.</p>
8	<p>In the “What is the Impact of this Change” section, the Workgroup has set out the benefits and costs of this change. Do you agree with the Workgroup’s view and are there are additional benefits and/or costs to set out? Please provide the rationale for your response.</p>	<p>We agree with the benefits and costs the workgroup have set out in the consultation.</p> <p>Transparency will support market participants’ decision making and will promote competition. Leading to a more efficient market with lower costs for consumers.</p> <p>The costs of implementation and ongoing publishing requirements are expected to be minimal.</p>