

Code Administrator 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 12 April 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 paul.j.mullen@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Joshua Logan
Company name:	Drax Group
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 in the right-hand side of the table below, including your rationale.

Standard Code Administrator Consultation questions	
1	<p>Do you believe that the GC0109 Original proposal or WAGCM1 better facilitates the Applicable Objectives?</p> <p>Yes, we believe both the GC0109 Original Solution and WAGCM1 better facilitate the Applicable Objectives. However, we believe the Original better meets the Applicable Objectives compared to WAGCM1.</p> <p>Applicable Objective (b) – Positive</p> <p>GC0109 (Original and WAGCM1) 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>Specifying that the publications will be on BMRS (as per the original) give additional certainty and clarity to market participants – for this reason we believe the Original better facilitates Applicable Objective (b) than WAGCM1.</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. 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 (Original and WAGCM1) 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</p>

		<p>capture all relevant alerts and introduce a homogeneous method for publication. Therefore, GC0109 (Original and WAGCM1) will promote efficiency in the implementation of the Grid Code arrangements.</p> <p>BMRS is a defined term in both the Grid Code and BSC and is referenced throughout the Industry Codes. The intension of GC0109 is to publish the warnings/ alerts on BMRS, and as such it is more efficient and unambiguous to specify this in the legal text. For this reason, we believe the Original better facilitates Applicable Objective (e) than WAGCM1.</p> <p>Conclusion</p> <p>Both the Original and WAGCM1 better facilitate the Grid Code Applicable Objectives. However, the Original solution better facilitates the Objectives in comparison to WAGCM1.</p>
2	Do you support the proposed implementation approach?	Yes, we support implementation 30 days after an Ofgem decision.
3	Do you have any further comments?	No.