

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
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For reference the Applicable Grid Code Objectives are:

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- 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	Do you believe that the GC0109 Original proposal or WAGCM1 better facilitates the Applicable Objectives?	<p>We believe both options better facilitate the applicable objectives, but our preference is the original proposal.</p> <p>Applicable Objective (b) – Positive GC0109 (Original & WAGCM1) delivers better transparency of GB electricity system warnings and alerts, giving participants access to this information in the same timely fashion. These alerts can influence trading decisions and it is widely recognised that additional transparency promotes efficiency in markets and supports competition.</p> <p>WAGCM1 lacks reference to this and introduces doubt that the ESO will maintain a central place for this information, while the original agrees that publications will be on BMRS. Due to this, the original proposal provides market participants with additional certainty and better facilitates this objective than WAGCM1.</p> <p>Applicable Objective (d) – Positive Both the original and WAGCM1 encourage compliance with EU electricity regulation, this will avoid risks of breaching insider trading or market abuse legal requirements placed on market participants. The importance of transparency is referenced in EU codes and numerous publications by ACER, ENTSO-E and the EU Commission. Therefore, both the original and WAGCM1 better facilitate this objective.</p> <p>Applicable Objective (e) – Positive This proposal presents a consistent method for publication when just now, some alerts are published and others aren't, whilst some use different platforms with different timescales for publication. Consequently, GC0109 (Original & WAGCM1) will encourage efficiency in implementing of Grid Code arrangements</p> <p>The aim of GC0109 is to publish warnings and alerts on BMRS, this is a defined term in the Grid Code & BSC and referenced throughout the codes.</p>

		<p>It is less ambiguous to ensure legal text specifies publication will be on BMRS. As a result, the Original better facilitates Applicable Objective (e) than WAGCM1.</p> <p>We believe the original and WACGM1 are neutral against objectives a) and c).</p>
2	Do you support the proposed implementation approach?	Yes, we believe the implementation approach outlined is sensible.
3	Do you have any further comments?	No comments.