



Whole System Technical Code Team

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Response to Digitalised Whole System Technical Code Consultation 1

November 10, 2021

Uniper

Uniper is an international energy company headquartered in Düsseldorf with around 12,000 employees in more than 40 countries. The company plans to make its power generation CO₂-neutral in Europe by 2035. In the UK, Uniper operates a flexible generation portfolio of seven power stations capable of powering around six million homes, and a fast-cycle gas storage facility.

Consultation Response

The consultation on a Digitalised Whole System Technical Code (WSTC) raises a range of different topics. In our view there are a number of fundamental questions which need to be answered before some of the issues raised can be addressed, and for this reason we do not answer each question set out in the consultation. The main points we wish to make are:

- As described in the consultation, BEIS and Ofgem are consulting on Energy Code Reform (ECR). In parallel they are consulting on the Future System Operator (FSO). The outcomes of both reviews have significant implications for the governance and management of all energy codes. In our view it is premature to undertake new major code restructuring projects before these consultations are concluded.
- The use of digital codes has been discussed by many industry groups in recent times. The legal standing of digital codes is yet to be established. Until this is better understood it is difficult to offer a considered view on the way forward on this aspect.
- It is not clear that combining codes would make things easier for stakeholders. Currently a large number of users are covered by the provisions of one code and not the other. Therefore, they know that they do not need to consider what the other code says at all. Combining the two codes into one larger code may simply leave stakeholders with more legal text to analyse in order to understand which provisions apply to them. As we mention above, should a



digital version of the code mistakenly identify an incorrect set of requirements a user may unwittingly breach the provisions of the code and have no legal protection.

- Combining the Grid Code and the Distribution Code would be a significant project that would be resource intensive and affect many different stakeholders. It should only proceed with clear and unequivocal sanction by Ofgem and wide industry support. It is not clear that there are significant benefits which would be worth the effort, disruption and cost involved. There are arguably more pressing matters that should be addressed which would be a better use of time and resources.