

Response to Digitalised Whole System Technical Code Consultation 1

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Q1. What challenges do you have with using the technical codes?

The challenges enumerated in the Consultation reflect those raised by members. In addition, the disproportionate effect of code complexity on smaller companies who do not have the resources to engage a dedicated regulatory officer must be acknowledged.

Q2. Where there are challenges, please provide examples of areas where you would like to see change.

N/A

Q3. Are there further advantages and disadvantages of the potential solutions above?

While aligning technical codes on key issues and while a consolidated code with retention of existing codes may increase accessibility, they will provide little long term value to industry if they only exist as a non-binding handbook or reference guide.

Q4. Which of the issues identified in section 2, (or by yourself in answer to Q1) would be addressed by each of the solution options?

A single WSTC, binding on all parties and written in plain English, would indeed address the market accessibility issues highlighted above.

Q5. Are there additional potential solutions for whole system alignment which could deliver value?

N/A

Q6. Are there additional potential solutions for digitalisation which could deliver value?

N/A

Q7. Which of the potential solution(s) for digitalisation do you see as providing the most benefit?

Clearly, an artificial intelligence driven platform, with the manual search option retained, is conceptually appealing. Any 'smart search' or cross-code signposting would be beneficial from an ease of use perspective.

Q8. What risks and/or opportunities do you see in digitalising codes in parallel to work on code alignment, potential consolidation, and the Energy Codes Reform programme? Please also share your views on how best to mitigate these risks.

Providing that the WSTC work under consideration here is undertaken with a mind to making it adaptable and transferrable depending on the outcome of the ECR, there should not be a problem.

Q9. Do you think the digitalised codes should be legally binding or for guidance only? Why?

For the reform to deliver maximum value, digitalised codes ought to be legally binding for both industry and NGESO. If not, parties will be obliged to cross reference what the digitalised code iterates with the original, negating the aim of increased market accessibility and efficiency. The desired outcomes of participation, innovation and certainty necessitate that digitalised codes be legally binding.

Q10. Do you see value in progressing these work packages independently of the ECR and do you think they should be progressed?

In line with above, work should commence on a digitalised, legally binding WSTC with the view to such a code being unaffected or transferrable, depending on the outcome of the ECR.

Q11. Are there other opportunities that could be considered?

N/A

Q12. Stakeholders have articulated that there is strong interdependence between options in whole system code consolidation or alignment (Section 3.1), digitalisation (Section 3.2) and the delivery of solutions (Section 3.5). Do you have a preferred combination of these solutions that you see as delivering the best value considering the issues implementing the solutions? Please provide a rationale for your response.

It seems that priority should be given to those options which are not dependant on the outcome of the ECR project and which can be undertaken most time and cost effectively. However, as for larger changes, including a legally binding digitalised WSTC, it may be prudent to develop a framework for how such work would be undertaken, pending the outcome of the ECR.

Q13. Are there other aspects of the project delivery where you see risks and opportunities to mitigate these?

It is foreseeable that the most difficult issue will be finding consensus on an ambitious, binding WSTC. From all sectors, the time and cost effectiveness of such an undertaken must be weighed against other reforms currently under consideration.

Q14. Do you agree with the key benefits outlined above and can you see other benefits resulting from this project?

The ADE agrees with the key benefits highlighted.

Q15. Do you think that the proposed governance structure will enable delivery of the project? Would you change any aspects? If so, why?

The proposed governance structure appears reasonable.

Q16. Which elements of the project would you, or your organisation, like to be involved in? If so, please state what capacity, and provide a short description of the perspective and value that you would bring to the project.

The ADE would welcome being included in the project groups.

Q17. What principles should apply when forming membership and ways of working for the various project groups?

Of course, key stakeholders from industry and trade should be at the forefront of these groups and ought to be decided both in consultation with trade organisations and by open advertisement in NGESO literature and on their website.

Q18. What are your views on the proposed Terms of Reference for the steering group?

The terms of reference appear generally sufficient. However, better representation from industry and trade associations is advised since both ESO and Grid Code parties are suggested to have 1-2 participants whereas wider industry only has 1.

Q19. Do you have further views on how to best include all the relevant perspectives in the governance of the project?

More representation from wider industry, especially a representative from a relatively small company alluded to above, will achieve a better range of perspectives.

Q20. How do you think the steering group should make decisions, particularly if there is not consensus?

Each sector as opposed to member should be afforded equal weight, hence having different sectors of industry represented is vital.

Q21. What are your views on the proposed stakeholder engagement? Is there more that can be done to ensure effective stakeholder engagement?

The proposed stakeholder engagement is generally acceptable. However, there should be assurances that feedback will be incorporated into the work, advisory and steering group processes.

Q22. Would you like to attend the webinars? If so, please leave your contact details in your feedback.

Invitations to webinars would be welcome. Refer to the contact details above.

Q23. Would you like to request a regular update from the project at your forum? If so, please leave contact details of your forum in your feedback.

Yes, Refer to the contact details above.

Q24. What are your views on the proposed schedule?

The proposed schedule seems reasonable.

This consultation is available online here:

<https://www.nationalgrideso.com/industry-information/codes/digitalised-whole-system-technical-code>

Please return responses to box.wholesystemcode@nationalgrideso.com before 5pm on 12th November 2021.