

2nd Code Administrator Consultation Response Proforma**GC0148: 'Implementation of EU Emergency and Restoration Code Phase II'**

Industry parties are invited to respond to this consultation expressing their views on the proposed solution to address the [Authority Send back](#).

Please send your responses to grid.code@nationalgrideso.com by **5pm on 4 May 2023**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Milly Lewis Milly.Lewis@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Antony Johnson
Company name:	National Grid ESO
Email address:	Antony.Johnson@nationalgrideso.com
Phone number:	07966 734856

I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential

☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

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.

2 nd Code Administrator Consultation questions		
1	Do you believe that the previously consulted GC0148 solutions or the proposed solution to address the Authority Send back better facilitates the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:
		Previously consulted GC0148 solutions
		Proposed solution to address the Authority Send back
		<p>As per our previously submitted CAC response in October 2022, we support the Original and WAGCM2, although on balance we prefer the Original. We do not support WAGCM1 as this only defines the Emergency, Blackout and Restoration States and there is no definition of Normal or Alert States; noting that the Transmission System will eventually return to either normal or alert state and therefore a definition of these needs to be included as this is part of the messaging that will need to be shared on BMRS – therefore WAGCM1 is unimplementable. Other than this slight difference WAGCMs 1&2 are identical.</p> <p>We do however recognise that the Grid Code text (the Original, WAGM1 and WAGM2) as submitted to The Authority in October 2022 was deficient in its treatment of Aggregators. We believe that the revised text as discussed with Stakeholders and as presented to Panel in March 2023 provides a better solution, and in this respect would support the Original and WAGM 2 with a preference for the Original.</p>
2	Do you have any other comments?	<p>We would note one minor point that the amendments to the Planning Code (PC.A.5.5.4) and Operating Code 6 (OC6.6.6(c)) should be reflected in the Data Registration Code. The data submitted under the Data Registration Code is a summary (in a tabular format) of the data required in various sections of the Grid Code. Therefore, we see this as a minor non-material change and necessary really only for completion. We believe this issue should have been raised during the Code Administration Consultation in October 2022.</p>

