

Workgroup Consultation Response Proforma**GC0161: Changes to OC6 to allow for site protection and demand disconnect rotation**

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 **04 July 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 Jonathan.whitaker@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Andrew McLeod	
Company name:	Northern Powergrid	
Email address:	Andrew.mcleod@northernpowergrid.com	
Phone number:	07710 723489	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body	<input type="checkbox"/> Interconnector <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D <input type="checkbox"/>E</p> <p>This proposed modification enables DNOs to arrange demand disconnection plans such that, where technically feasible, supplies would be maintained to pre-designated protected customers, thus minimising the societal impact associated with NGESO initiated demand control.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Northern Powergrid supports the implementation approach and has instigated work to comply with the Grid Code modification proposal in time for winter 2023/24</p>
3	Do you have any other comments?	In order to ensure that the same level of protection for critical sites where interruption will have a societal impact is afforded across the other areas of OC6, Northern Powergrid believes that NGESO should proceed with its plan for further modifications to other sections in OC6, particularly OC6.5.4.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>

Specific Workgroup Consultation questions		
5	Do you agree with the proposed change to the wording in OC6.1.5 (if not, please provide your rationale)?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>
6	Do you agree with the addition of the clause in OC6.5.3 (if not,	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p>

	please provide your rationale)?	Yes. There is a minor typographical error in the draft legal text in OC6.5.3 (e)...on the instructions of...should read...on the instruction of....(without the 's').
7	Do you understand the proposed modification to mean that not all consumers' sites that are on the ESEC protected site list will be protected all the time?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Yes. Northern Powergrid understands that this modification will only exclude those customers on the ESEC Protected Sites List from being de-energised for demand control under OC6.5.3 and not under any other aspect of OC6.</p>
8	Do you believe that any other sections of the Grid Code will be impacted by this modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Northern Powergrid does not believe that other sections of the Grid Code will be impacted by this modification but we do believe that other sections of OC6 should be modified in the future to extend the same protection to other aspects of demand control where technically feasible.</p>