

Workgroup Consultation Response Proforma

GC0159: Introducing Competitively Appointed Transmission Owners

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 15 February 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 Ruth Roberts ruth.roberts@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Isaac Gutierrez\ Priyanka Mohapatra
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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:

- 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*

- 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 better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/> A</td> <td><input checked="" type="checkbox"/> B</td> <td><input checked="" type="checkbox"/> C</td> <td><input type="checkbox"/> D</td> <td><input type="checkbox"/> E</td> </tr> </table>	Original	<input type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input type="checkbox"/> A	<input checked="" type="checkbox"/> B	<input checked="" type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E			
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>SPR, as a developer of renewables, would like to reiterate that CATOs shall be subjected to the same relevant codes as the TOs i.e. the Connection and Use of System Code (CUSC), the Grid Code (GC), the System Operator – Transmission Owner Code (STC), and the Security & Quality of Supply Standard (SQSS).</p> <p>It will be in the interest of the wider industry, for CATOs to demonstrate the same accountability as incumbent TOs to ensure reliability and security of the transmission system</p>						
3	Do you have any other comments?	Although in principle SPR supports the implementation approach, SPR does not see a great deal of advantage on using a CATO as if they are to build/upgrade parts of the network, they will be subject to the same factories delivery slots as any other TO (or generator). A CATO likely will not receive special treatment from suppliers.						
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>						

Specific Workgroup Consultation questions		
5	The Grid Code does not specify how TOs initially form/create their RES. Noting the workgroup discussion on this point, do you have a preferred approach that CATOs might follow to do this?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Any User connecting generation to a transmission network requires certainty of technical requirements. SPR strongly believes that any RES shall be inherited from the incumbent TO and the CATO shall maintain them. SPR does not consider appropriate for a CATO to start developing RES as this could certainly delay projects connection dates and become an obstacle to deliver renewable energy projects and achieve net zero. SPR is of the understanding that workgroup GC0103: The introduction of harmonized Applicable Electrical Standards in GB to ensure compliance with EU connection codes will resume meetings. That workgroup will be a good opportunity to discuss CATO responsibilities regarding RES as a harmonized RES model will be discussed for the whole of GB.</p>