

Code Administrator Consultation Response Proforma**GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements**

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 26 March 2024**. 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:	Mike Kay	
Company name:	ENW	
Email address:	mikekay@p2analysis.co.uk	
Phone number:	Click or tap here to enter text.	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network <input type="checkbox"/> 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"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

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
- 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 Code Administrator Consultation questions						
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</td> </tr> </table> <p>It is not clear that the original or WAGCM1 do not have a negative effect on Objective A; they both may. Such an assessment requires a wider piece of work than is within the scope of GC0117.</p>	Original	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E	WAGCM1	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
Original	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E					
WAGCM1	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E					
2	Do you have a preferred proposed solution?	<p> <input type="checkbox"/>Original <input type="checkbox"/>WAGCM1 <input checked="" type="checkbox"/>Baseline <input type="checkbox"/>No preference </p> <p>Whilst fully acknowledging the unsatisfactory current situation, the materiality of the original defect has never been stated. The original solution is going further than is needed to resolve the original defect. NGESO has effectively turned the original defect into a modification to resolve their perceived emerging balancing issues and costs. Again this is a valid concern, but it is not appropriate to use the original defect as a vehicle for this important strategic need. The reach of the Grid Code deep into distribution systems is an overarching strategic energy system issue which should be driven by clear policy development, not by a narrow focus working group operating within only the scope of Grid Code governance. The trigger for Generators to have to accede to the full rules of the market is an issue of government policy, set in the licensing regulations. This is an intention and decision made by parliament; any change to this, exposing Generators to new costs etc, should also be made by parliament, unless the authority is specifically delegated.</p> <p>We are aware that there are several initiatives considering enduring requirements for the overall management of generation including Open Networks and the August 2020 Ofgem RFI relating to generator visibility. The DNO members of the GC0117 WG have suggested many times that these projects should come to a conclusion in the area of embedded generation visibility and control, before industry code modifications are raised based on these conclusions. To do otherwise could make future changes even more complex and potentially expose stakeholders to stranded costs.</p> <p>It is far from clear, that in spite of the efforts of the workgroup, some of the key stakeholders affected by this proposal have assimilated its possible effects on them. The impacts of this modification, particularly on future embedded generators and DNOs, have not been sufficiently developed to form a view as</p>				

		to whether the claimed balancing mechanism savings, and inefficiencies unstated in the original proposal, fully outweigh all the other costs of such a radical change of responsibilities for DNOs, the operation of their networks, and the effects on embedded generators.
3	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.
4	Do you have any other comments?	Click or tap here to enter text.
5	Do you agree with the that GC0117 does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?	<input type="checkbox"/> Yes <input type="checkbox"/> No I do not have an opinion on this – I'm not aware that the WG discussed this interaction.
6	Do you have any comments on the impact of GC0117 on the EBR Objectives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.