

**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](mailto: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](mailto:Milly.Lewis@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Alan Creighton	
<b>Company name:</b>	Northern Powergrid	
<b>Email address:</b>	alan.creighton@northernpowergrid.com	
<b>Phone number:</b>	07850 015515	
<b>Which best describes your organisation?</b>	<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"/> 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>Click or tap here to enter text.</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
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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>The materiality of the defect, which as we understand it, relates to the additional costs faced by generators when connecting new generators in GB due to the different connection processes and technical requirements depending on the geographic location, has not been demonstrated.</p> <p>During the extended time during which this modification has been developed there has been a change in the industry and generation landscape and, because of this, the workgroup became focussed on concerns associated with visibility and control of embedded power stations. We recognise that these are valid concerns that need to be discussed and addressed by industry but we are not convinced that the GC0117 workgroup, focussed only on the implications for the Grid Code, is the right place for the discussions on the holistic industry wide changes required to meet net zero targets. The Original Proposal cuts across many of the industry discussions such as those in the Open Networks Project and the ESO DER Visibility Programme. By way of an example, the stated objective of the ESO DER Visibility programme is to: deliver visibility and control of Distributed Energy Resources (DER) &amp; Consumer Energy Resources (CER) across all timescales (real-time to long-term) – receiving, procuring, storing, analysing, and making decisions on this data –to improve operation of the whole-energy system.</p> <p>With respect to the Original Proposal:</p> <p>a. The benefits associated with increased visibility alone seem to be limited.</p>				

- b. The benefits case associated with increased control have been illustrated only by two case studies or two half hour periods in 2022. It is unclear whether these two case studies are representative of a whole year or whether the scenarios in the case studies align with the FES. Hence the case for additional NGESO control for power stations >10MW is unclear.
- c. It is clear that increased NGESO control of >10MW power stations will have implications for DNOs particularly as they transition to DSOs. It is unclear whether increased control of power stations >10MW by NGESO is the optimum solution from a whole system perspective. Issues that have been raised in the working group but not satisfactorily addressed include:
  - i. The treatment of >10MW power stations associated with ANM schemes managing DNO constraints;
  - ii. The treatment of >10MW power stations associated with Regional Development Plans;
  - iii. The treatment of >10MW power stations associated with the emerging Delegated Technical Limits initiative;
  - iv. The primacy between NGESO instructions and DNO instructions issues to a Generator at the same time; and
  - v. Uncertainty as to how DNO constraints would be managed in real time in accordance with BC1.
- d. It is unclear whether there will be implications for connection queue management; this is particularly important at the moment as queue management is an increasing concern for stakeholders.

With respect to WAGCM1:

- a. This was introduced as an alternative harmonisation approach that would limit the implications for DNOs by extending the arrangements in E&W to Scotland. It is understood that there were good reasons for the regional differences when they were introduced and there doesn't seem to be evidence justifying the continuation of different arrangements in Scotland.
- b. This approach would enable the ESO and DNOs to develop the optimum solutions for managing both TO and DNO constraints in a harmonised whole system way utilising ANM schemes, RDPs and Delegated Technical Limits integrating the ESO and DSO roles.
- c. However, WAGCM1 would introduce differences between existing power stations in Scotland and new power stations in Scotland, that could further complicate

		<p>implementing an enduring holistic solution consistent across GB.</p> <p>Therefore, retaining the existing Baseline option, to preserve the present arrangements pending the development and agreement on the holistic industry wide changes required to meet net zero targets is the most appropriate option for GC0117.</p>
3	Do you support the proposed implementation approach?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Please see our response to question 2.</p>
4	Do you have any other comments?	No.
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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
6	Do you have any comments on the impact of GC0117 on the EBR Objectives?	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>