

Workgroup Consultation Response Proforma**GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Stations 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 5 August 2022**. 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:	Graeme Vincent
Company name:	SP Energy Networks representing the following licensees <ul style="list-style-type: none"> • SP Distribution plc • SP Manweb plc and • SP Transmission plc.
Email address:	graeme.vincent@spenergynetworks.co.uk
Phone number:	07753 622336

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 and WAGCM1 better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> <p>The overall benefits of the proposed modifications have not been sufficiently demonstrated in our view. Whilst it is clear that the transmission and distributions system have fundamentally changed since the existing definitions were introduced at the time of BETTA in 2005 and a rethink is needed, the proposals as drafted do not fully address the perceived deficiency.</p> <p>The proposals also need to be considered within a wider strategic context as the industry develops and evolves to meet the needs of developing and operating a net zero system. Changes therefore should align with wider industry initiatives which are aimed at improving the coordination and planning of the system as we move to net zero such as the creation of the Future System operator (FSO), the evolving role of Distribution System Operators (DSOs) and those arising from the work of the Open Networks project.</p>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	WAGCM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E
Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									
WAGCM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									
2	Do you support the proposed implementation approach?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Please see previous comments.</p>												
3	Do you have any other comments?	No, other than those contained within our answers to the specific questions raised below.												
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 believe it is appropriate to change the definition of Demand Capacity and associated	No particular view though it is always good to have equitable

	Grid Code definitions so that they align with the changes to Large, Medium and Small Power Stations? If so, do you think this should be addressed as part of this Grid Code modification or separately?	treatment where it is appropriate to have it.
6	Do you see any unintended consequences of this changing the definition of Demand Capacity? If so, what are your reasons for this?	Not from our initial view though we would have to consider the change in the context of any consequential impacts it may have in respect of wider industry documentation and processes.
7	Do you think the suggested change in the definition of Registered Capacity is appropriate and do you think this change should apply across the original and Alternative solutions proposed? If not, please state your reasons.	Yes, the definition should be amended to avoid the continuation of any ambiguity around the application of this term.
8	Of the solutions proposed (i.e., the Original and Alternatives) which solution do you favour and why?	Neither – we would prefer to retain the baseline at this current moment in time.
9	Do you think there are unintended consequences in defining Type 1 and Type 2 Licence Exempt Embedded Medium Power Stations (LEEMPS) separately? If so, please state your reasons.	Based on our initial review and understanding we have not identified any particular issues – though clearly it does add further differentiations between existing LEEMPS generators. It should also be noted that currently the LEEMPS definition does not apply in Scotland so any option which introduces this concept should ensure that any reclassification of generation does not adversely impact existing connected generation or the network to which they are connected and ensures that data sharing between all relevant parties is retained
10	Do you think that there is merit in establishing a holistic net-zero view of the technical and commercial arrangements for connecting new and operating existing and new generators to meet the requirements of all stakeholders, then developing the necessary cross code changes to implement the new framework, rather than just change the definitions of power station sizes with this Grid Code modification?	Yes. There is a considerable amount of change being experienced within the industry at the moment and being able to coordinate this across the whole system would be beneficial and would align with our whole system licence requirements. This would also ensure that any wider commercial and technical impacts can be fully considered and the

		most appropriate whole system solution be delivered.
11	Do you agree that the revised arrangements should apply to new generators connected to the system i.e., not applied retrospectively?	No – the only way to fully address the perceived defect would be to ensure that all generators are treated on an equitable basis which would require any changes to be applied in a retrospective manner. Otherwise we are continuing to treat generators connected in different parts of GB inconsistently in respect of their enduring operational arrangements.
12	Should the same approach on retrospectivity apply to all options?	Yes – this would ensure that there is a consistency in approach provided to all users regardless of where and when they connected.
13	Can you identify any potential consequential impact from the GC0117 modification proposal(s) on current electricity market or balancing arrangements as set out in other code frameworks (e.g., BSC, CUSC)? If yes, please identify these.	The impact on the BSC should be assessed more fully and the CUSC should be assessed to avoid any unintended consequences which may arise from changing the definition of Small and Large (and depending on the modification/alternative the removal or addition of Medium).