

Workgroup Consultation Response Proforma

GC0164: Simplification of Operating Code No.2

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 08 June 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 grid.code@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Alan Creighton	
Company name:	Northern Powergrid	
Email address:	Alan.creighton@northernpowergrid.com	
Phone number:	07850 01515	
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"/> System Operator <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** (*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 Workgroup, Panel or the industry for further consideration*)

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.

1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E The intent of the modification is to make the Grid Code more accessible. Provided that the obligation on parties remains unchanged it is difficult to see that this intent isn't met by the proposal.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No We are concerned that scarce industry resources have been used developing this modification and the benefits seem to be intangible, however given that this resource has been spent, it is reasonable to implement the proposed changes.
3	Do you have any other comments?	Detailed comments have been provided on marked up versions of the: <ul style="list-style-type: none"> • Glossary and Definitions • Planning Code • Operating Code 2 The majority of these suggestions are editorial, but there are some comments where the code obligations do seem to have changed slightly; it is unclear whether these are intentional or not.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text.

Specific Workgroup Consultation questions		
5	Do you think that the changes proposed make it	As a relatively informed reader it's difficult to form a view of whether the legal text is easier to understand than the existing legal text.

	easier to understand than the existing version?	
6	Do you agree that the Grid Code obligations wouldn't change if this version is implemented when comparing to the existing version?	No. There are some requirements that have been changed or been removed although i) some may have arisen from unintended editorial changes (e.g. no longer referring to both Generators and Interconnector Owners), or ii) these may be minor and reflect current practice.
7	Do you agree with the Workgroup view that there should be only one set of Glossary and Definitions applicable to the entire Grid Code?	Yes. Having multiple definitions for the same defined term would cause confusion.
8	Do you agree with the proposed change to move the position of the Generators Performance Charts from the Operating Code to the Planning Code?	This seems to be a reasonable proposal.
9	In order to help quantify the industry resources required to implement this type of change, please indicate the number of hours spent reading and responding to this consultation.	Approximately ten hours, although significantly more time has been spent during the development of this modification as a member of the working group. Northern Powergrid has concerns that scarce industry resources have been used developing this modification and the benefits seem to be intangible. It is our view that these resources could have been better utilised addressing other, more important, issues and concerns. Whilst we would have preferred spending Northern Powergrid resources on other issues, we felt it important to make sure that the proposed text did not change any of the obligations placed on Network Operators given the importance of outage planning for maintaining supplies to customers. We think it is important to learn from the process of modifying OC2 before deciding whether to review / redraft other sections of the Grid Code.