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Code Administrator 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@nationalenergyiso.com by **5pm GMT on 16 January 2025**. 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@nationalenergyiso.com

Respondent details	Please enter your details	
Respondent name:	Alastair Frew	
Company name:	Drax	
Email address:	alastair.frew@drax.com	
Phone number:	07730697290	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" 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 Panel or the industry for further consideration*)

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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.

Standard Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		This is not actually changing any requirements so does not have any effect on the objectives
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		Click or tap here to enter text.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.

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4	Do you have any other comments?	<p>In the main OC2 legal text the paragraph numbering format in the bulk text seems to have changed from the normal paragraph format as letters and roman numerals are normally full contained within brackets as follows (a), (i), (ii) etc but this has change to a), i), ii) etc. Now whilst at the beginning of the paragraph this makes no odds and the reference is clear, the problem occurs when these references are included in the main text as there are now an awful lot of close brackets without the associated open brackets making the text harder to read. For example, “Where a Generator or Interconnector Owner or a Network Operator or Restoration Contractor (as provided for in OC2.2.1 f))” would be easier to read without looking for a missing open brackets if was written in this form “Where a Generator or Interconnector Owner or a Network Operator or Restoration Contractor (as provided for in OC2.2.1(f))”. Even if this is not adopted, I do not think the formatting is currently correct all the way through the document.</p> <p>Other points on OC2:-</p> <p>OC2.2.1 the last sentence has one open bracket and 3 closing brackets, but I am not sure that any of the closing brackets are actually meant the close the open bracket and it is potentially missing.</p> <p>OC2.3.1.2.1 I think the previous version of the text was easier to understand as there was an individual subparagraph for each User type so each User only needed to read the appropriate subparagraph. Now they are all mixed together and Generators are now having to read and understand paragraphs with terms like “External Interconnection Circuit” included with do not apply to them and are only normally used in paragraphs for Interconnectors.</p> <p>OC2.3.1.2.6 (b)(v) the first word in the brackets should be “this” not “his”.</p>
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		<p>OC2.3.1.4a in the last line the term “Grid Entry Point” should be “Grid Supply Point” it is correct in the table above the text.</p> <p>OC2.3.1.4i this paragraph has a number of references to paragraphs first we have an i) which is the letter i then i which is the roman numeral along with ii, iii and then we have a c) the references need to be clearer as to which specific paragraph they are referring to.</p> <p>Planning code appendix G the charts are under the wrong titles, the chart under the GB Code User has references to the ECC and additional items and is for EU Code Users similarly the chart under the EU Code User is the chart for GB code users.</p>
5	Do you agree with the Workgroup’s assessment that the modification does not 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>