

Grid Code: Code Administrator Consultation Response Proforma

GC0105: System Incident Report

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5:00pm** on **11 December 2019** to Grid.Code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be sent to Grid.Code@nationalgrideso.com.

These responses will be included within the Draft Grid Code Modification Report to the Grid Code Review Panel and within the Final Grid Code Modification Report to the Authority.

Respondent:	<i>Garth Graham (garth.graham@sse.com)</i>
Company Name:	<i>SSE Generation Ltd.,</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(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

	<p>the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p>
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Code Administrator Consultation questions

Q	Question	Response
1	<p>Do you believe that GC0105 better facilitates the Applicable Grid Code objectives? Please include your reasoning.</p>	<p>GC0105 Original does better facilitates the efficient discharge by the Licensee of its legal obligation to comply with EU Law and, in particular, SOGL in that the TSO (NGESO) <u>shall ensure transparency</u> (Article 4(2)(b) of SOGL) as well as supporting the aims of SOGL in terms of “<i>ensuring and enhancing the transparency and reliability of information on transmission system operation</i>” (Article 4(1)(g) of SOGL).</p> <p>In this regard, it is regrettable that the publication, by National Grid, of the previous System Incident Report was unilaterally stopped by National Grid shortly before the SOGL came into legal effect (but after SOGL was known of by National Grid - before the SIR was withdrawn) having been published from May 1998 till circa the start of 2017.</p> <p>The timely publication (monthly with the original) of the System Incident Report will better facilitates the maintenance, operation and security of the GB transmission (and distribution) system, as demonstrated by the events on 9th August 2019.</p> <p>Furthermore, the timely publication (monthly with the original) of the System Incident Report will better facilitates the competition in the generation and supply of electricity in GB.</p> <p>Whilst WACM1 has many of the broad positive attributes of the Original; it is, however, a truncated version of the report when compared (1) with what National Grid used to produce (before, regrettably, it unilaterally ceased its publication) and (2) what is proposed with the Original.</p>

Q	Question	Response
2	Do you support the proposed implementation approach?	Yes, and in particular that there will be retrospective reporting of the relevant information from the period when National Grid ceased to publish its SI report to the date that the new report commences; to ensure that the historic records are available to GB stakeholders.
3	Do you have any other comments in relation to GC0105?	