

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>Phil Smith 07779 560468 philip.smith4@nationalgrideso.com</i>
Company Name:	<i>National Grid ESO</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<i>For reference, the Applicable Grid Code objectives are:</i> (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;

	<p>(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</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>No. We do not believe the original or alternative proposals better facilitate any of the Grid Code objectives, for the following reasons:</p> <ol style="list-style-type: none"> 1. NGESO is already producing the report, so codifying it is unnecessary. Although the original reason for the report to be produced has now passed following the completion of all code amendments to loss of mains protection settings, NGESO have recognised stakeholder feedback and made a commitment to continuing to produce the original report. It is being published as part of our System Operability Framework (SOF). Therefore, codifying the requirements is an unnecessary step, as the reporting is already being provided voluntarily and NGESO have committed to continuing to do this. No reports have been missed during the development of this modification and NGESO has at no point stopped production of this information. 2. The Original Proposal adds cost to NGESO and the consumer, with no clear benefit. The Original Proposal significantly increases the scope of the report compared with the existing content. In addition, by reducing the threshold at which a frequency deviation would be included, the number of incidents that need to be reported increases, however no rationale has been given for the new proposed frequency deviation threshold, and it has not been made clear what additional benefit would be derived from this or the other extra information. Expanding the scope of the reporting adds additional cost to NGESO and therefore ultimately to consumers, so without a clear benefit we cannot support this change. 3. This adds needless complexity into code The Energy Codes Review highlights that the GB codes are too extensive and complex. Adding in 'BAU' reporting requirements would add to this problem. 4. Codifying the report removes flexibility Mandating the detail of these reporting requirements into code removes all flexibility, as any future change to the specification will require another Grid Code modification, which also adds unnecessary time and cost.
2	<p>Do you support the proposed implementation approach?</p>	<p>Yes. We support the proposed implementation if this code modification is approved.</p> <p>However, as outlined above, we do not support the original or alternative proposal.</p>

Q	Question	Response
3	<p>Do you have any other comments in relation to GC0105?</p>	<p>We support the baseline. However, we believe the WAGCM is preferable to the Original Proposal. The WAGCM raised by NGESO is simply a codified version of the existing report. Therefore, it has the benefit of being less costly to produce than the original, but still adds no value over the baseline position.</p> <p>Two other modifications seek to codify reporting from NGESO. Two other in-progress Grid Code modifications, GC0133 and GC0109, also seek to codify reporting requirements. If these three proposals were to be approved, this would appear to represent a shift in the purpose and scope of the Grid Code from being a technical and operational specification for equipment to becoming a reporting mechanism which could set a precedent.</p>