

## 1 Grid Code Industry Consultation Response Proforma

**GC0107 / GC113: The open, transparent, non-discriminatory and timely publication of the generic and/or Power Generating Module specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the Requirements for Generators (GC107) and Demand Connection Conditions (GC113)**

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.

A Workgroup Consultation has already been run for GC0107, which closed on 6 September 2019. Responses to this consultation are available by accessing the file “GC107/113 9 October Workgroup Papers” which is located under the “Workgroup tab” at:

<https://www.nationalgrideso.com/codes/grid-code/modifications/gc0107-open-transparent-non-discriminatory-and-timely-publication>

**On the basis that GC0113 could impact different stakeholder groups, the Workgroup on 9 October 2019 agreed to run a separate Workgroup Consultation for GC0113.**

Please send your responses by **5pm on 22 November 2019** to [Grid.Code@nationalgrideso.com](mailto:Grid.Code@nationalgrideso.com). Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

Any queries on the content of the consultation should be addressed to Paul Mullen at [paul.j.mullen@nationalgrideso.com](mailto:paul.j.mullen@nationalgrideso.com)

These responses will be considered by the Workgroup at their next meeting at which members will also consider any Workgroup Consultation Alternative Requests. Where appropriate, the Workgroup will record your response and its consideration of it within the Final Workgroup Report which is submitted to the Grid Code Review Panel.

<b>Respondent:</b>	<i>Graeme Vincent graeme.vincent@spenergynetworks.co.uk</i>
<b>Company Name:</b>	<i>SP Energy Networks.</i>
Please express your views regarding the Workgroup Consultation, including rationale.  (Please include any issues, suggestions or queries)	<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</i>

	<p><i>systems in the national electricity transmission system operator area taken as a whole;</i></p> <p><i>(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</i></p> <p><i>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</i></p>
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### Standard Workgroup consultation questions

<b>Q</b>	<b>Question</b>	<b>Response</b>
1	<b>Do you believe that GC0113 Original proposal and the 2 proposed Workgroup Alternatives as set out in Annex 8 of this document better facilitates the Applicable Grid Code Objectives?</b>	<p>No, it is not clear how these proposals allow the licensee to efficiently discharge Objective (d) or promote efficiency in (e).</p> <p>We also note that the spreadsheet (and the consultation document) suggest that the proposals will also apply to Transmission Owners (TOs) and that there may be a 'Medium Impact' to these parties. However, we do not see any suggestion on what these data requirements are and how these obligations will be placed upon the TOs. The proposed legal text, as is. quite right for Grid Code legal text, does not apply to Transmission Owners and changes will be required to the System Operator Transmission Owner Code (STC) to pass these obligations through to the TOs. As such this modification can only be considered as a partial solution if indeed TO's are impacted.</p>
2	<b>Do you support the proposed implementation approach?</b>	No
3	<b>Do you have any other comments?</b>	The benefits from the proposed modification are not clear and the consultation document does not clearly articulate which/what parties will use the data for. Nor does it identify the costs to parties (who may not be the beneficiaries) to manage the process going forward, making a cost benefit analysis difficult.
4	<b>Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?</b>	No, although we note that two WAGCMs have been raised by a member of the WG seeking to limit the application of the modification. Both are preferable compared to the original proposal but not as good as the baseline.

## Specific questions for GC0113

Q	Question	Response
5	Do you believe that the obligation to track variations from standard parameters should be placed on the 14 <sup>1</sup> Distribution Network Operators (DNOs) (as opposed to just the ESO) for providers of Demand Side Response, and do you believe the obligation should also be extended to the 13 <sup>2</sup> Independent DNOs (IDNOs) for Demand Side Response connected to their networks? In this latter case, how do you think the obligation on the IDNOs should be imposed?	If the action is to be placed on DNOs then this modification needs to consider how it applies to independent DNOS as to do otherwise would be discriminatory.
6	This modification imposes a new requirement on DNOs for them to share some limited settings and requirements from individual providers of Demand Side Response agreements with the ESO in an anonymous form or with Ofgem (if they request it). Do stakeholders have any views on this, and in particular how providers of Demand Side Response can be made appropriately aware of the proposal?	No comment

<sup>1</sup> Eastern Power Networks Plc; Electricity North West Limited; London Power Networks Plc; Northern Powergrid (Northeast) Limited; Northern Powergrid (Yorkshire) Plc; Scottish Hydro Electric Power Distribution Plc; South Eastern Power Networks Plc; Southern Electric Power Distribution Plc; SP Distribution Plc; SP Manweb Plc; Western Power Distribution (East Midlands) Plc; Western Power Distribution (South Wales) Plc; Western Power Distribution (South West) Plc; and, Western Power Distribution (West Midlands) Plc.

<sup>2</sup> Energy Assets Networks Limited; Energetics Electricity Limited; ESP Electricity Limited; Fulcrum Electricity Assets Limited; G2 Energy IDNO Limited; Harlaxton Energy Networks Limited; Independent Power Networks Limited; Leep Electricity Network Limited; Murphy Power Distribution Limited; The Electricity Network Company Limited; UK Power Distribution Limited; Utility Assets Limited; Vattenfall Network Limited according to the public list on Ofgem's website <https://www.ofgem.gov.uk/electricity/distribution-networks/connections-and-competition/independent-distribution-network-operators>

Q	Question	Response
7	How often should the additional settings and requirements be a) updated and b) published following bilateral agreement between network operator and User of site specific values – daily, weekly, monthly, quarterly, six monthly, annually?	Annual updates, times to coincide with other submissions would be preferable.
8	How do you feel you will benefit from this proposed modification – please quantify benefit where possible?	At this moment in time, we cannot see what benefit this modification will give for network owners/operators.
9	What costs and/or risks do you believe would arise from implementing this proposed modification – please quantify these where possible?	The implementation seems relatively simple and therefore the implementation costs could be relatively low (depending on your point of reference of course). The risks are going to be around the maintenance and upkeep of the ‘spreadsheet’ and the reporting of the data which could expose parties to non-compliance with code requirements and therefore the additional overheads to ensure timely and accurate reporting of data values may be in excess of the benefits of its collation.
10	The code mapping spreadsheet produced as part of the GB implementation of the European Connection Codes (RfG, DCC and HVDC) includes all Grid Code references where settings required by DCC were made. An ENTSO-E implementation monitoring spreadsheet <sup>3</sup> has also been produced showing the settings made in each member state. What additional value does this modification proposal deliver?	None

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<sup>3</sup> ENTSO-E implementation monitoring spreadsheet can be found at:  
[https://docstore.entsoe.eu/layouts/15/download.aspx?SourceUrl=https://docstore.entsoe.eu/Documents/Network%20codes%20documents/CNC/CNC\\_Non\\_exhaustive\\_requirements.xlsm](https://docstore.entsoe.eu/layouts/15/download.aspx?SourceUrl=https://docstore.entsoe.eu/Documents/Network%20codes%20documents/CNC/CNC_Non_exhaustive_requirements.xlsm)

Q	Question	Response
11	<p>How do you believe the template, which is being consulted on in spreadsheet form (Annex 2) for convenience should be incorporated into the Grid Code legal text? The options include converting it into a plain document table and including it in the Data Registration Code in line with all other formal data requirements, or somehow referring in the legal text to governed version of the spreadsheet. The Workgroup would be pleased to hear views on the balance of the certainty and rigour of the governance of the requirements versus simplicity?</p>	<p>The template needs to be simple and easy to understand if it is to provide benefit. If it is to be part of the Grid Code then it needs to be incorporated into the Grid Code legal text in line with other Grid Code data requirements.</p>
12	<p>Do you agree that this requirement should be drafted as a new Grid Code section (i.e. OC3) or would it be better to accommodate in the Planning Code alongside similar data?</p>	<p>No the requirements are generally related to Planning or European connection conditions and therefore should be incorporated into the relevant position. None of the requirements relate to the network operation so it does not seem a sensible solution to include them as a new operating code.</p>