

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. 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

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.

Respondent:	Mike Kay mikekay@p2analysis.co.uk
Company Name:	P2 Analysis Ltd
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p>(a) <i>To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</i></p> <p>(b) <i>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);</i></p> <p>(c) <i>Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution</i></p>

Commented [MK1]: What are these?

	<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

Q	Question	Response
1	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?	No. It is neutral for (a) to (c) above, detrimental to objective (d) and particularly detrimental to (e) above.
2	Do you support the proposed implementation approach?	No
3	Do you have any other comments?	<p>Yes. This modification proposal aims to achieve two distinct things. The first is to create a GB specific listing of all the values and settings that were needed to be determined for the implementation of the DCC in GB. At the time this was raised by the Proposer, in November 2017, there was arguably some merit in this as the GB values had not then been finally determined – although as soon as they were determined, they were published in the Grid Code and the Distribution Code thus negating the need for this first part of the proposal.</p> <p>The second part of the proposal is to try to track variations either within the allowed range of these values and settings, or deviations from them. In contemplating the usefulness of this second part it is instructive to recognize that demand side services are in their infancy and there is still much merit in allowing innovation to flourish, thus naturally leading to differences of detail in the implementation of demand response services. The envisage reporting mechanism is unlikely to be seen as transparent, comprehensive, responsive, or even helpful, by all those interested in the development of demand response services</p>

Q	Question	Response
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	I have already raised to WAGCMs – and which are included in the consultation.

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 ¹ 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 ² 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?	<p>No.</p> <p>These obligations should not be placed on any DNO. If they are, then this modification is incomplete because it does not provide a mechanism to include the IDNOs.</p> <p>I have drafted two WAGCMs that address this issue. Both of these are preferable to the original proposal, although both are inferior to the current baseline.</p>

¹ 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.

² 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
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.
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?	Given the limited real value of this information, annually, as part of other annual data submissions etc, would be appropriate.
8	How do you feel you will benefit from this proposed modification – please quantify benefit where possible?	We can see no benefit and note that the WG has not received any supportive input from stakeholders thus far.
9	What costs and/or risks do you believe would arise from implementing this proposed modification – please quantify these where possible?	The implementation costs are low. However the incidence of having anything definite to report will be so low that those involved/responsible for the reporting are likely to overlook the requirement, or for it to be done late. This will expose them to the risk of non-compliance with a code requirement. The administrative procedures to manage this will be out of proportion to any value.

Q	Question	Response
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 ³ has also been produced showing the settings made in each member state. What additional value does this modification proposal deliver?	None
11	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?	The large spreadsheet must be boiled down to a textual table that can be included as text in the Grid Code legal text, just like any other Grid Code data requirement.
12	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?	The logical place to put this is in the annex to the Planning Code – PC.A.3. There is not logic to putting this planning data requirement into a new operating code; it is not even an operational matter.

³ ENTSO-E implementation monitoring spreadsheet can be found at:
https://docstore.entsoe.eu/layouts/15/download.aspx?SourceUrl=https://docstore.entsoe.eu/Documents/Networking%20codes%20documents/CNC/CNC_Non_exhaustive_requirements.xlsm