

Grid Code – Code Administrator Consultation Response Proforma

GC0107 & GC0113 seek to publish generic and/or specific values in connection agreements stemming from the Requirements for Generators (GC0107) and the Demand Connection Code (GC0113).

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 **6 March 2020** 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 Draft Final Modification Report to the Grid Code Review Panel.

These responses will be included within the Final Modification Report which is submitted to the Authority.

Respondent:	<i>Mike Kay</i>
Company Name:	<i>P2 Analysis Ltd</i>
<p>Please express your views regarding the Code Administrator Consultation, including rationale.</p> <p>(Please include any issues, suggestions or queries)</p>	<p>(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</p> <p><i>Neutral</i></p> <p>(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);</p> <p><i>Neutral</i></p> <p>(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> <p><i>Neutral</i></p> <p>(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant</p>

	<p>legally binding decisions of the European Commission and/or the Agency; and</p> <p><i>Negative – this adds costs and risk to all network licensees for which the proposer has demonstrated no tangible benefits</i></p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements</p> <p><i>Negative – this adds costs and bureaucracy to Grid Code arrangements for which the proposer has demonstrated no tangible benefits</i></p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

GC0107 Code Administrator Consultation questions

Q	Question	Response
1	<p>Do you believe GC0107 or any of the WAGCMs proposed better facilitate the Grid Code Objectives?</p> <p>Please include your reasoning.</p>	<p>No.</p> <p>When the modification was raised there was much less information available to stakeholders in GB than there is now the RfG and the DCC has been incorporated into the Grid and Distribution Codes – so this removes one of the key drivers for this modification.</p> <p>Although in theory this adds transparency, in practice there is probably likely to be very limited differentiation in approaches between customers and installations, and certainly for any reason other than local requirements that will not translate into general applicability. The monitoring and publishing is an overhead that will not be justified by the amount of information, and any value that might theoretically flow from it, that will be actually within the scope of the modification.</p>
2	<p>Do you support the proposed implementation approach?</p>	<p>No – these two modifications should not be implemented.</p> <p>Furthermore they are not complete in itself – they would need further work to implement for IDNO networks.</p>

Q	Question	Response
3	Do you have any other comments in relation to GC0107?	No

GC0113 Code Administrator Consultation questions

Please fill in with any different answers for GC0113 or indicate if your answers to GC0107 are equally applicable to GC0113.

Q	Question	Response
4	Do you believe GC0113 or any of the WAGCMs proposed better facilitate the Grid Code Objectives? Please include your reasoning.	No. When the modification was raised there was much less information available to stakeholders in GB than there is now the RfG and the DCC has been incorporated into the Grid and Distribution Codes – so this removes one of the key drivers for this modification. Although in theory this adds transparency, in practice there is probably likely to be very limited differentiation in approaches between customers and installations, and certainly for any reason other than local requirements that will not translate into general applicability. The monitoring and publishing is an overhead that will not be justified by the amount of information, and any value that might theoretically flow from it, that will be actually within the scope of the modification.
5	Do you support the proposed implementation approach?	No – these two modifications should not be implemented. Furthermore they are not complete in itself – they would need further work to implement for IDNO networks.

Q	Question	Response
6	Do you have any other comments in relation to GC0113?	No