

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>Rob Wilson</i>
Company Name:	<i>NGESO</i>
<p>Please express your views regarding the Code Administrator Consultation, including rationale.</p> <p>(Please include any issues, suggestions or queries)</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 the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and (e) To promote efficiency in the implementation and administration of the Grid Code arrangements

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>This proposal comes in two parts:</p> <ul style="list-style-type: none"> • Firstly, to record the settings made during the initial implementation of RfG and DCC as were approved by Ofgem. This is unnecessary. As highlighted in the workgroup, an implementation monitoring spreadsheet developed by ENTSO-E already does this but is also of considerably more value as it includes the settings made across all member states. • Secondly, to record those values that are set subsequently on a bilateral basis. It appears that this part of the proposal is based on a misunderstanding that values can be set bilaterally. As has been explored in the workgroup, the vast majority of settings, other than those of genuinely only local site-specific interest, were set once during GB implementation of RfG and DCC as approved by Ofgem. If different values were to be applied this could only be done by seeking a derogation with Ofgem from the values as set out in the Grid or Distribution Codes. <p>No benefit to generators, developers or manufacturers has ever been demonstrated as part of this proposal. Therefore the proposal will be neutral against objectives (a)-(d) and negative against (e) in applying an administrative burden to network operators – and ultimately a cost to consumers - without any rationale.</p>
2	<p>Do you support the proposed implementation approach?</p>	<p>No. There is no purpose or benefit to codifying these requirements which are unnecessary and add no value ultimately to consumers while representing an overhead for network operators.</p>

Q	Question	Response
3	<p>Do you have any other comments in relation to GC0107?</p>	<p>This modification highlights that in the current governance process there is no need for a proposer or workgroup to quantify or otherwise evidence the value of a proposal.</p> <p>Progressing this modification has been a waste of industry time and resources that would have been better spent elsewhere. It highlights the need for a review of the current arrangements and for the development of a 'Code Manager' role in which there is greater control over the way in which amendments to the code are progressed.</p>

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	<p>Do you believe GC0113 or any of the WAGCMs proposed better facilitate the Grid Code Objectives?</p> <p>Please include your reasoning.</p>	<p>As above – although if anything there is even less substance to the GC0113 proposal as there are even fewer potentially bilateral settings resulting from DCC (and again, in the limited cases identified in the workgroup these are all only of local interest).</p>
5	<p>Do you support the proposed implementation approach?</p>	<p>As per GC0107 response.</p>
6	<p>Do you have any other comments in relation to GC0113?</p>	<p>No.</p>