

Workgroup Consultation Response Proforma**GC0162: Changes to OC6 to amend the operational timings for the delivery of the additional demand reduction above 20%, with a focus between 20% and 40%**

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.

Please send your responses to grid.code@nationalgrideso.com by **5pm on 18 September 2023**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Lizzie Timmins Elizabeth.timmins@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Garth Graham	
Company name:	SSE Generation	
Email address:	Garth.graham@sse.com	
Phone number:	01738 456000	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable Grid Code Objectives are:

- 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*

Please express your views in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D <input type="checkbox"/>E</p> <p>We have considered the proposal form and the Workgroup deliberations to date and our current view is that this proposal does better meet Applicable Objectives (a), (c) and (d) whilst being neutral in terms of (b) and (e) for the reasons put forward by the Proposer.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>The proposed implementation approach, of 10 Business Days, as set out on page 11 of the consultation is an approach that we support at this time.</p>
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/>Yes <input checked="" type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>

Specific Workgroup Consultation questions		
5	Do you agree with the proposed changes to the wording in OC6 as set out in the legal text? Please explain your rationale.	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>
6	Do you agree that the scenarios on pages 7-10 of the Workgroup Consultation correctly reflect the proposed legal text?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>The scenarios helpfully summarise the proposed legal text at this time.</p>

7	Do you believe any other sections of OC6 or any other sections of the Grid Code will be impacted by this modification?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Not at this stage, although we appreciate that the Workgroup is still deliberating on the Legal Text (which may, as a result, be subject to further changes).
8	Do you agree there are changes required to the Distribution Code DOC6 as a result of this modification? Please explain your rationale.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No In our view it will be important to ensure consistency of approach between the Grid Code and Distribution Code to avoid any inadvertent differences which, at times of system stress may give rise to uncertainty (which would not be conducive to an appropriate overall outcome for end consumers).