

Workgroup Consultation Response Proforma**GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Stations requirements**

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 5 August 2022**. 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 Ruth Roberts ruth.roberts@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
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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 and WAGCM1 better facilitates the Applicable Objectives?	Mark the Objectives which you believe each solution better facilitates:
		Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WAGCM1 <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		<p><u>Original</u></p> <p>(a)</p> <p>The proposed solution will harmonise systems across the GB energy market which helps make it easier and more efficient to operate the electricity system, by introducing a common, clear set of requirements which every new connection to the electricity network will need to meet.</p> <p>(b)</p> <p>Implementation of the proposed solution should help facilitate competition in the generation of electricity by improving transparency and consistency of access arrangements across different electricity systems in GB. This removes a potential barrier to entry and allows market participants to trade more easily by ensuring that there is a level playing field in terms of connection requirements, thus improving competition in generation. The proposed solution should assist the creation of a pan-GB market for power generating module (PGM) technology, by increasing the commonality of PGM requirements. This should help improve competition between manufacturers and make it cheaper to build PGM technology, thus reducing costs for consumers.</p> <p>(c)</p> <p>The proposed solution aims to introduce commonality and reduce complexity of arrangements within GB in particular. This should improve the security and efficiency of the system as a whole. This should materialise through increased standardisation of equipment and specifications across the whole of GB in particular. In turn this should lead to improved economies of scale driving improved security. Therefore this modification will promote the security and efficiency of the electricity generation, transmission and distribution systems.</p> <p>(d)</p>

		<p>The proposed solution seeks to ensure that the Grid Code is consistent with these European Regulations which; as retained GB (UK) law following Brexit (and the Withdrawal Agreement); are directly applicable to GB. The proposed solution seeks to ensure that the Grid Code is consistent with these (retained) European Regulations.</p> <p>(e)</p> <p>The application of a single, harmonised, common minimum requirement across the whole GB system will produce efficiency in the implementation and administration of the Grid Code arrangements as it avoid the costs, risks and inefficiencies associated with operating to three separate arrangements today.</p> <p>The above reasoning also applies to <u>WAGCM1</u>.</p>
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <p>Whilst we support the proposed implementation, it is disappointing that implementation is to be delayed due (yet again) to the significant time delay within the ESO's IT infrastructure in terms of the delivery of change.</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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Click or tap here to enter text.</p>

Specific Workgroup Consultation questions

5	Do you believe it is appropriate to change the definition of Demand Capacity and associated Grid Code definitions so that they align with the changes to Large, Medium and Small Power Stations? If so, do you think this should be addressed as part of this Grid Code modification or separately?	As Proposer we have set out to the Workgroup that we are keen to hear views from stakeholders (in response to this consultation) on this matter before concluding what, if anything, falls within the solution. Given this we'll refrain from answering this question at this time.
6	Do you see any unintended consequences of this changing the definition of Demand Capacity? If so, what are your reasons for this?	Not at this time.

7	Do you think the suggested change in the definition of Registered Capacity is appropriate and do you think this change should apply across the original and Alternative solutions proposed? If not, please state your reasons.	As Proposer we have set out to the Workgroup that we are keen to hear views from stakeholders (in response to this consultation) on this matter before concluding what, if anything, falls within the solution. Given this we'll refrain from answering this question at this time.
8	Of the solutions proposed (i.e., the Original and Alternatives) which solution do you favour and why?	The Original, for the reason we set out in the Proposal form.
9	Do you think there are unintended consequences in defining Type 1 and Type 2 Licence Exempt Embedded Medium Power Stations (LEEMPS) separately? If so, please state your reasons.	Click or tap here to enter text.
10	Do you think that there is merit in establishing a holistic net-zero view of the technical and commercial arrangements for connecting new and operating existing and new generators to meet the requirements of all stakeholders, then developing the necessary cross code changes to implement the new framework, rather than just change the definitions of power station sizes with this Grid Code modification?	Yes. Applying different competitive rules for identical parties that are operating in the same marketplace offering the same product leads to higher (not lower) costs to consumers. Having a harmonised approach (of which GC0117 is but one example) leads to lower costs to consumers.
11	Do you agree that the revised arrangements should apply to new generators connected to the system i.e., not applied retrospectively?	As Proposer we have set out to the Workgroup that we are keen to hear views from stakeholders (in response to this consultation) on this matter before concluding what, if anything, falls within the solution. Given this we'll refrain from answering this question at this time.
12	Should the same approach on retrospectivity apply to all options?	In principle yes; unless justified otherwise.
13	Can you identify any potential consequential impact from the GC0117 modification proposal(s) on current electricity market or balancing arrangements as set out in other code frameworks (e.g., BSC, CUSC)? If yes, please identify these.	Not at this time.

