

**Code Administrator Consultation Response Proforma**

**GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station 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](mailto:grid.code@nationalgrideso.com) by **5pm on 26 March 2024**. 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 Milly Lewis [Milly.Lewis@nationalgrideso.com](mailto:Milly.Lewis@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Garth Graham	
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<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" 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

**wish my response to be:**

(Please mark the relevant box)

**Non-Confidential** (this will be shared with industry and the Panel for further consideration)

**Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

**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 Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	Mark the Objectives which you believe the proposed solution(s) better facilitates:
		Original <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		WAGCM1 <input type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		<p><u>Original</u></p> <p>As the Proposer of the Original we believe that this proposal better facilitates Applicable Objectives (a), (b) and (c) whilst being neutral in terms of (d) and (e).</p> <p>Our reasoning was set out in the proposal form, as follows:</p> <ul style="list-style-type: none"> <li>(a) "Reducing the Large Power Station threshold down to 10MW enables the ESO greater visibility and control of generation which in turn should reduce operating costs."</li> <li>(b) "The increased numbers of Generators within the Balancing Mechanism should result in increased competition."</li> <li>(c) "Greater transparency of Generation by the ESO should result in an increase to the efficiency of the operation of the Electricity System."</li> </ul> <p>Since writing this reasoning, just under six years ago<sup>1</sup>, further work within the Workgroup, as well as by the ESO, has both validated this reasoning as well as enhancing it.</p> <p><u>WAGCM1</u></p> <p>In principle, this alternative is, like the Original, looking to harmonise the relevant threshold levels (Small/Large) across GB and as such this is a positive development.</p> <p>However, by having a level appreciably higher (below 50MW [small], 50-100MW [medium] and above 100MW [large]) than the Original (10MW for the small/large differentiation) this, in our view, impedes 'Facilitating effective competition in the generation... of electricity' and it also impedes 'the development, maintenance and operation of an efficient, coordinated and economical system for the</p>

<sup>1</sup> [Modification Proposal \(nationalgrideso.com\)](https://nationalgrideso.com)

		<i>transmission of electricity</i> '. These impedances do not, upon reflection, better facilitate the Applicable Objectives.
2	Do you have a preferred proposed solution?	<input checked="" type="checkbox"/> Original <input type="checkbox"/> WAGCM1 <input type="checkbox"/> Baseline <input type="checkbox"/> No preference
		For the reasoning set out under Q1 above.
3	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<p>Having raised this proposal at the start of the summer in 2018 it is regrettable to us that compliance implementation could be out to 'circa 2027' – nine years later.</p> <p>We expect that if this proposal is approved (as we wish) that the ESO's IS (IT) delivery is prioritised to ensure the compliance implementation does not slip in order to ensure the positive benefits that, for example, the ESO's CBA has identified, are achieved in a timely manner.</p>
4	Do you have any other comments?	<p>We note the comments made by some Workgroup members (and alluded to in the late letter from the ENA @ Annex 26) in terms of the other ongoing initiatives. This is perhaps best summarised, in one of the Workgroup voting statement, as follows:</p> <p>"The Original Proposal cuts across many of the industry discussions such as those in the Open Networks Project and the ESO DER Visibility Programme"</p> <p>With due deference to those comments, we politely observe, given that GC0117 was raised before (and, in some cases, well before) those other initiatives, it might perhaps better be seen as:</p> <p>'many of the industry discussions such as those in the Open Networks Project and the ESO DER Visibility Programme cuts across the Original Proposal'</p> <p>GC0117 was raised in good faith to address a concern seen at that time – in spring / early summer 2018 - that other 'industry discussions' and initiative, such as 'Open</p>

		Networks Project <sup>2</sup> and the ESO DER Visibility Programme <sup>3</sup> have, subsequently, come to realise what we (with raising GC0117) had seen before.
5	Do you agree with the that GC0117 does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.
6	Do you have any comments on the impact of GC0117 on the EBR Objectives?	<input type="checkbox"/> Yes <input type="checkbox"/> No  Click or tap here to enter text.

<sup>2</sup> [Open Networks: Five Years ON – Energy Networks Association \(ENA\)](#)

<sup>3</sup> [download \(nationalgrideso.com\)](#)