

**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](mailto: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](mailto:ruth.roberts@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Caroline Bragg
<b>Company name:</b>	Association for Decentralised Energy
<b>Email address:</b>	Caroline.bragg@theade.co.uk
<b>Phone number:</b>	0203 031 8740

**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 checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E
		WAGCM1 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E
		Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
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
		Click or tap here to enter text.

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?	<p>The ADE considers that the case for changing the definition of Demand Capacity and associated definitions has not been made through this WG, nor has there been substantial discussion of options as there has been on the generation side. The ADE therefore does not support this WG making proposals on this.</p> <p>Without the case for change, the ADE does not a view on whether it is appropriate to change the definitions through a separate mod group.</p>
6	Do you see any unintended consequences of this changing the definition of Demand Capacity? If so, what are your reasons for this?	As above, this WG does not seem to have considered the consequences of changing the demand capacity side in any

		depth. Therefore, this question is premature. If there are distortions arising from this, this needs to be set out clearly in a new mod proposal.
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.	The ADE doesn't support this.  The ADE considers that the WG has not set out why the current status quo is creating material distortions – in particular, because the distortion driving the mod itself (i.e., bunching below MW thresholds) is unlikely to pertain to this situation. Further, the WG has also not explored fully how any change could be used to simplify and align Grid Code and Generation licensing given the discrepancies identified.
8	Of the solutions proposed (i.e., the Original and Alternatives) which solution do you favour and why?	The ADE supports WACGM1 as better facilitating the objectives in the simplest and most efficient way.
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.	The ADE doesn't have a view on this question.
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?	Given the extent of changes to the generation mix and the shift towards smaller generation, the ADE does consider this would be worthwhile; whilst noting that this proposal and what it would include specifically is relatively vague currently.
11	Do you agree that the revised arrangements should apply to new generators connected to the system i.e., not applied retrospectively?	The ADE agrees – these changes should not be applied retrospectively.
12	Should the same approach on retrospectivity apply to all options?	Yes.
13	Can you identify any potential consequential impact from the GC0117 modification	No.

<p>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.</p>	
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