

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
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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 checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E
		WAGCM1 <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input 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
		We support harmonisation of definition and treatment of small, medium, large generators across GB. We also support a clear definition of registered capacity in Grid Code.
3	Do you have any other comments?	We are concerned that the number of alternates in the working group might lead to no clear consensus at the end of this consultation. It will be useful to perform detailed cost benefit analysis and risk assessment for each alternate to reduce the number of alternates to select from.
		Additionally, we are concerned, that some of the alternates are heavily dependent on open networks project to provide operational visibility of DERs. This approach vastly increases the volume of data to be shared with NG ESO and we are unsure how and what NG ESO plans to do with this data. We are more in support of regional development programme, where DNOs play a more significant role managing Balancing Market information from embedded generators.
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	Yes, we believe alignment of definition of demand capacity

	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?	across regions is appropriate and should be addressed as part of this grid code modification. This will allow for alignment of implementation of demand capacity change with other changes of this Grid Code and will allow for a more harmonious implementation in general of registered capacity and demand capacity as part of the same modification.
6	Do you see any unintended consequences of this changing the definition of Demand Capacity? If so, what are your reasons for this?	No
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.	Yes, we think the suggested change in the definition of registered capacity is appropriate and should apply across the original and alternative solutions.
8	Of the solutions proposed (i.e., the Original and Alternatives) which solution do you favour and why?	<p>We support the solution proposed under Alternate 3 (RDP) and Alternate 4 (LEEMPS+ and RDP hybrid solution) in that order.</p> <p>We believe Alternate 3 will require RDP implementation increase visibility of generators under 100 MW for DNOs and NG ESO, through increased data sharing. This option will also allow for additional flexibility and ancillary services to be generated through 10-100 MW sized generators across GM, thus aiding future Net Zero operability</p> <p>The same can be achieved to an extent through implementation of the hybrid solution proposed in Alternate 4 implementing a hybrid solution of LEEMPS+ or 50-100 MW</p>

		and RDP for 10-50 MW sized generators.
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.	No
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?	There is merit in establishing a holistic net-zero view of technical and commercial arrangements for connecting and operating existing and new generators, which could also focus on net zero operability, rather than just capacity and demand. However, this work could be done in parallel with harmonisation of definitions of power system sizes through this Grid Code modification.
11	Do you agree that the revised arrangements should apply to new generators connected to the system i.e., not applied retrospectively?	Yes
12	Should the same approach on retrospectivity apply to all options?	Yes
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.	The degree of effect will depend on whether the original or the alternates get implemented. The original proposal will dramatically increase the number of BMs across GB. These BMs will however be of smaller size, than the BMs existing today. If NG ESO implements dynamic stochastic multi-stage dispatch model in future, as compared to the current forecast based sequential model, the original proposal could bring value in reducing overall balancing costs and creating more value for connected BMUs. However, as there are currently no plans to change NG ESO's dispatch model significantly, implementation of RDP across GB for 10-50 MW generations can provide more flexibility and services to NG ESO as compared to WAGCM1. It will

		also provide better business models for connecting BESS, Wind and solar PV generation < 100 MW.
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