

Grid Code Industry Consultation Response Proforma

GC0074 GCRP Membership

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 by **1 August 2014** to Grid.Code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

Respondent:	Cem Suleyman (cem.suleyman@drax.com)
Company Name:	Drax Power Limited
1. What are your views on Interconnector users being given a seat on the GCRP as an occasional attendee when it is deemed appropriate by the GCRP and/or the Code Administrator based on the subject matter, rather than as a permanent member where an Interconnector Representative would be expected to attend all meetings.	Based on the Workgroup discussions it appears reasonable for Interconnector users to be given a seat as an occasional attendee.
2. Do you agree with the group that (i) the Scottish TOs should continue to have a seat on the Panel (ii) that the DNOs should continue to be represented by three seats on the Panel (2 for England & Wales and 1 for Scotland) and (iii) that manufacturers should not be represented on the Panel.	We agree with all three decisions.
3. Do you believe that each NGET Representative should hold 1 vote each, as for other representatives, or that this should be reduced to, for example, 2 votes between the proposed 4 NGET Representatives.	Based on the proposed four NGET representatives we consider it reasonable that each representative should have a vote.
4. How do you think a tied vote should be dealt with in an election?	The vote should be decided randomly by drawing lots (for example by tossing a coin). In the event of a tie, this is the method adopted for elections to Parliament, local councils etc. To, as suggested in the consultation document, weight the votes cast by size (or some other metric) to determine a tied result will likely disadvantage smaller independent

	market participants relative to larger established market participants. We believe that such a method is incompatible with facilitating competition.
Do you believe that GC0074 better facilitates the appropriate Grid Code objectives?	Yes for the same reasons provided in the consultation document.
Please provide any other comments you feel are relevant to the proposed change.	Whilst not strictly applicable to GC0074, we consider that extending open governance principles to the Grid Code (as exist in the BSC and CUSC) will complement a number of the objectives associated with GC0074. We fully support the proposed solution recently raised in a paper at the 16 July GCRP meeting by Eggborough Power Ltd, Energy UK, E.ON, ESBI, SSE and Waters Wye Associates. Ultimately, we recommend that NGET raises a modification to the Grid Code on behalf of the industry to extend open governance principles to the Grid Code.