

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:	<i>Mike Kay 08433 113900 mkay@iee.org</i>
Company Name:	<i>Electricity North West</i>
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.	<i>We should have a seat for interconnectors – and they attend as they deem fit based on individual meeting agenda.</i>
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.	<i>(i) Yes (ii) Yes (iii) Yes – manufacturers should NOT be represented.</i>
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.	<i>1 vote per formal representative.</i>
4. How do you think a tied vote should be dealt with in an election?	<i>No opinion.</i>
Do you believe that GC0074 better facilitates the appropriate Grid	<i>For reference the applicable Grid Code objectives are:</i>

<p>Code objectives?</p>	<p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p>No</p> <p><i>(ii) to facilitate 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);</i></p> <p>No</p> <p><i>(iii) 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; and</i></p> <p>No</p> <p><i>(iv) 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.</i></p> <p><i>Not applicable – but certainly needs careful consideration of future EU Network Codes.</i></p>
<p>Please provide any other comments you feel are relevant to the proposed change.</p>	<p><i>The current management of the Total System includes Grid Code powers to apply requirements on to all small generators. Once the need to address something which affects small generators has been determined, it is often progressed through joint GCRP/DCRP work. However the ToRs and drivers etc are initially determined by the GCRP. Currently this is fine because small generators are explicitly recognized in the size bands of generators' seats. So it is legitimate to allow the GCRP to opine on things affecting small generators because small generators are represented.</i></p> <p><i>The proposed eligibility for election appears to lose the appointment of small generators'</i></p>

	<p><i>representatives to the Panel.</i></p> <p><i>The existing hierarchy of Grid Code and Distribution Code is important, and the existing pattern of representation essential to make this hierarchy legitimate.</i></p> <p><i>It is worth noting that this will change when the RfG becomes law – the need for the hierarchy reduces. However there will be issues important for Total System operation beyond the scope of RfG (which should be confining itself to cross border issues) which will have an effect on small generators – so there is an enduring need for them to be directly represented.</i></p>
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