



Alternative Request Proposal Form		At what stage is this document in the process?
<h1>GC0132 WAGCM2</h1> <p>Mod Title: Updating the Grid Code governance process to ensure we capture EBGL change process for Article 18 Terms and Conditions (T&Cs)</p>		<div> <div>01</div> <div>Proposed Workgroup Alternative</div> </div> <div> <div>02</div> <div>Formal Workgroup alternative</div> </div>
<p>Purpose of Alternative: To apply a consistency in application of the Article 10(6) justification powers by the industry code Panels.</p>		
<p>Workgroup vote outcome: <i>Formal alternative</i></p>		

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1 Alternative proposed solution for workgroup review

The BSC equivalent change proposal (P392) solution being taken forward in the BSC means that the powers set out in Article 10(6); “a sound justification for including or not including the views resulting from the consultation shall be provided” is exercised not by the TSO but by the code Panel. This WAGCM would permit that approach to be utilised (along with the Original) in the Grid Code, which ensures a consistency across the industry codes.

2 Difference between this proposal and Original

WAGCM2 Changes from Original:

- GR.15.12 ~~Where a **Grid Code Modification Proposal** constitutes an **EBGL Amendment**, **The Company**, when undertaking its role in the **Grid Code Review Panel** or **Working Groups** during the **Grid Code Modification Process**, shall provide justification for including or not including the views of stakeholders resulting from the **Code Administrator** consultation.~~
- GR.18.9 The **Grid Code Review Panel** shall evaluate each **Grid Code Modification Proposal** and determine whether the **Grid Code Modification Proposal** constitutes an **EBGL Amendment** and its expected impact on the objectives and recitals of **European Regulation (EU) 2017/2195** (and in the event of disagreement **The Company's view shall prevail**).
- GR.19.1(g) Where a **Grid Code Modification Proposal** constitutes an **EBGL Amendment**, the **Grid Code Review Panel** shall provide a sound justification for including or not including the views of stakeholders resulting from the **Code Administrator** consultation taking into account the recitals of **European Regulation (EU) 2017/2195** and the objectives set out in Article 3 of the same.
- GR.20.8(f) where a **Grid Code Modification Proposal** constitutes an amendment to the **EBGL Article 18 terms and conditions**, to evaluate the impact of those amendments to the objectives and recitals of **European Regulation (EU) 2017/2195**.
- GR.21.10(c) where a **Grid Code Modification Proposal** or any **Workgroup Alternative Grid Code Modification(s)** constitutes an **EBGL Amendment**, the expected impact on the objectives and recitals of **European Regulation (EU) 2017/2195**.

- GR22.2(l) whether the **Grid Code Modification Proposal** or any **Workgroup Alternative Grid Code Modification(s)** constitutes an **EBGL Amendment** and if so, and in addition to (i) above, **the Grid Code Review Panel's The Company's sound** justification for including or not including the views resulting from the **Code Administrator's** consultation in the **Grid Code Modification Report** **taking into account the objectives and recitals of European Regulation (EU) 2017/2195.**
- GR.22.2(m) where a **Grid Code Modification Proposal** or any **Workgroup Alternative Grid Code Modification(s)** constitutes an **EBGL Amendment**, the expected impact on the objectives **and recitals** of **European Regulation (EU) 2017/2195.**

EBGL Article 18 Terms and Conditions	Terms and conditions which have been approved by the Authority pursuant to and for the purposes of Article 18 of European Regulation (EU) 2017/2195 . In the context of the Grid Code these terms and conditions are identified for convenience in Grid Code Governance Rules Annex GR.B and as such is amended from time to time in accordance with the process set out in Articles 4, 5, 6 and 10 of EBGL.
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3 Justification for alternative proposal against Grid Code objectives

Impact of the modification on the Applicable Grid Code Objectives:	
Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Neutral
(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);	Neutral
(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;	Neutral
(d) To efficiently discharge the obligations imposed upon the	Positive

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	Positive

This alternative will be more efficient than the Original as it will ensure a consistency in approach to the application of the Article 10(6) powers by the elected industry Panels in GB, and accords with the justification NGESO has proposed with its equivalent BSC proposal (P392).

4 Impacts and Other Considerations

While not directly impacting any other codes, as the EBGL A18 process applies equally to all GB frameworks falling within the T&Cs, so any considerations of a more efficient process should be shared with the CUSC and BSC panels or workgroups also considering these changes for their codes.

Consumer Impacts

None directly, but in facilitating a more efficient process and in mitigating the risk of future non-compliance some efficiency benefits will be delivered for consumers.

5 Implementation

The same implementation requirements apply as per the original proposal.

6 Legal Text

The legal text can be located in the zip folder in Annex 2. The differences in legal text when compared with the Original solution can be found in section 2.