

**Grid Code Workgroup Consultation Response Proforma****GC0131: 'Quick Win' Improvements to Grid Code open governance arrangements**

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 29 April 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation please contact **Nisar Ahmed** [Nisar.Ahmed@nationalgrideso.com](mailto:Nisar.Ahmed@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com).

Respondent details	Please enter your details
<b>Respondent name:</b>	Rob Wilson
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**For reference the applicable Grid Code objectives are:**

- Implementation;
- Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text;
- Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup;
- Be mindful of impact with CUSC; and
- Consider where removal of 1 or more components will facilitate treatment of the Modification as Quick Wins.

**Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.**

Standard Workgroup Consultation questions		
1	Do you believe that the GC0131 Original Proposal better facilitates the Applicable Grid Code Objectives?	<p>In terms of the questions asked through the objectives set out above, implementation should be to any modifications in progress at the time that the modification is approved and full legal text has been provided by the workgroup.</p> <p>It might be worth (as in (c)) providing a slot at a future GCDF to summarise the way in which the proposals have been developed and to engage with the wider stakeholder community before the modification is concluded.</p> <p>The CUSC panel have asked to be kept informed of progress as it is sensible that positive changes to one code are likely to be of similar value to the other.</p> <p>Finally, a number of amendments have already been made to the original proposal and areas without support removed or modified. One remaining item over which there has been debate is however the test given to alternatives in a workgroup to see whether they should be developed. In the Grid Code at present, if a majority of a workgroup judges an alternative to be better than the baseline it is progressed. This modification changes this test to be better than the original proposal which while not agreed by all parties is actually correct – it matches with the treatment in the BSC and also with the Transmission Standard Licence Conditions for the Grid Code (C14) as presented below:</p> <p><i>C14.2A. The licensee shall establish and operate procedures for the modification of the Grid Code (including procedures for modification of the modification procedures themselves), so as to better facilitate achievement of the applicable Grid Code objectives, which procedures shall provide:</i></p> <p><i>(v) for the development and consideration of any alternative modification which may, as compared with the proposed modification, better facilitate achieving the applicable Grid Code objective(s)...</i></p> <p>Very similar provisions are made in the licence conditions covering the BSC (C3). The BSC also</p>

		<p>takes the interpretation that the assessment of an alternative is against the original and not the baseline as in this extract from the BSC section F:</p> <p><i>2.6.4 The Workgroup shall:</i></p> <p><i>(a) evaluate the Modification Proposal for the purpose set out in paragraph 2.6.2;</i></p> <p><i>(b) where appropriate, develop an alternative proposed modification (the "Alternative Modification") which, as compared with the Proposed Modification, would better facilitate achievement of the Applicable BSC Objective(s);</i></p>
2	Do you support the proposed implementation approach?	Yes. This should be straightforward and in applying to any modifications in progress will start delivering benefits immediately.
3	Do you have any other comments?	<p>Please note that the legal text in the proposed GR.22.4 (iii) which clarifies the route by which a modification can be amended due to issues highlighted as part of the CAC has also been used in modification GC0132. There is no conflict here but this and a number of other changes made to the Governance Rules section in GC0132 are likely to change the baseline for GC0131 before it is submitted and care in implementation will be required.</p> <p>One other comment on this new format for consultation responses which is otherwise much clearer; referring to applicable Grid Code objectives as in the consultation questions above is confusing and wrong as these are only as set out in C14 of the transmission licence conditions and are not variable.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	No