

Published on 17/07/2023 - respond by 5pm on 17/08/2023

Code Administrator Consultation Response Proforma

GC0161: Changes to OC6 to allow for site protection

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 17 August 2023**. 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 Jon Whitaker Jonathan.whitaker@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details	
Respondent name:	Garth Graham	
Company name:	SSE Generation	
Email address:	Garth.graham@sse.com	
Phone number:	01738 456000	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input checked="" type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input checked="" type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

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);

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- 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 Code Administrator Consultation questions		
1	Please provide your assessment for the proposed solution(s) against the Applicable Objectives?	<p>Mark the Objectives which you believe the proposed solution(s) better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D <input type="checkbox"/>E</p> <p>We concur with the reasoning provided by the Proposer as to why the Original better facilitates the Applicable Objectives (a) and (d) whilst being neutral in terms of (b), (c) and (e).</p>
2	Do you have a preferred proposed solution?	<p><input type="checkbox"/>Original <input type="checkbox"/>Baseline <input type="checkbox"/>No preference</p> <p>Click or tap here to enter text.</p>
3	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We concur with the proposed implementation approach given the understandable desirability, expressed by the UK Government, for having this change in place ahead of winter 2023/24.</p>
4	Do you have any other comments?	<p>We very much welcome and support the changes proposed by GC0161, for the Grid Code Applicable Objectives reasoning we provide in our answer to Q1 above.</p> <p>Notwithstanding that, we are also very mindful that GC0161 only deals with one of the three 'tools in the tool box' identified within ESEC, namely the rota disconnection of non-protected load (and its utilisation at times when some or all Grid Code Demand Control measures are invoked).</p>

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		<p>These three tools are identified in paragraph 3.1 of the 2019 version of ESEC¹ in the following terms:</p> <p>“• Public appeals by the UK Government for voluntary restraint; • Orders or directions under the Energy Act 1976 requiring restrictions on consumption by industry, commerce and other undertakings²; • Directions under the Energy Act 1976 or the Electricity Act 1989 requiring rota disconnections and associated restrictions.”</p> <p>However, it is important to be mindful of the need to utilise the other two tools in the ESEC ‘tool box’; namely public appeals and the issuing of formal directions or orders to non-essential load.</p> <p>Using these two tools ahead of (and then maintaining their use alongside) rota disconnection will be critical if we are to minimise the impact (that is, the loss of electricity supplies for three-hour blocks of time) to end consumers; and, in particular, vulnerable customers.</p> <p>Indeed, it is possible, in some circumstances, that the demand reduction seen by the use of such public appeals alongside the pre-prepared orders or directions “<i>requiring restrictions on consumption by industry, commerce and other undertakings</i>”³ could entirely avoid the need for rota disconnections (be that via the ESEC or Grid Code approach) that GC0161 relates to.</p> <p>Even where this is not the case it is probable that using those two other tools could see one level (and possibly two?) of rota disconnection being avoided which, if this was the case, would see circa 5% (possible up to 10%?) of consumers maintaining their electricity supply (rather than losing it, via rota disconnection, for one or more three-hour block).</p>
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¹ [Electricity supply emergency code \(ESEC\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² Examples of these orders, as shown in Annex 3 of the 2005 version of ESEC (pages 18-22), include: The Electricity (Advertising, Display): etc.) (Control) Order; The Electricity (Heating) (Control) Order; The Electricity (Lighting) (Control) Order; The Electricity (Restriction) Order; The Electricity (Industrial and Commercial Use) (Control) Order; and The Electricity (Non-Domestic and Non-Industrial Premises) (Control) Order.

³ Paragraph 3.2, ESEC (2019).

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