

Code Administrator Consultation Response Proforma**GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements**

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 26 March 2024**. 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 Milly Lewis Milly.Lewis@nationalgrideso.com or grid.code@nationalgrideso.com

| Respondent details | Please enter your details | |
|--|---|---|
| Respondent name: | Rachel Hodges | |
| Company name: | Cubico Sustainable Developments Ltd | |
| Email address: | Rachel.hodges@cubicoinvest.com | |
| Phone number: | 07765144505 | |
| 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 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 |

wish my response to be:

(Please mark the relevant box)

☒ **Non-Confidential** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

For reference the Applicable Grid Code Objectives are:

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity
- 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);
- 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;
- 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
- 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> <table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input checked="" type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input checked="" type="checkbox"/>D <input type="checkbox"/>E</td> </tr> </table> <p>There are benefits and issues associated with both options. But neither option meets all of the required objectives and overall, they seem to create more issues than they solve.</p> | Original | <input type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E | WAGCM1 | <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E |
| Original | <input type="checkbox"/> A <input type="checkbox"/> B <input checked="" type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E | | | | | |
| WAGCM1 | <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E | | | | | |
| 2 | Do you have a preferred proposed solution? | <p> <input type="checkbox"/>Original <input type="checkbox"/>WAGCM1 <input checked="" type="checkbox"/>Baseline <input type="checkbox"/>No preference </p> <p>The existing definitions of small, medium and large have been developed across the different regions to reflect the different needs of the network and so are best placed to serve those needs. Both options presented have issues – either relating to the impact on generators and DNOs and the complexity of the system or in relation to the ESO's visibility of the network. A change from the current definitions will introduce more complexity as there will be different rules for generators connected before and after the implementation.</p> | | | | |
| 3 | Do you support the proposed implementation approach? | <p> <input type="checkbox"/>Yes <input checked="" type="checkbox"/>No </p> <p>If we definitely need to have a single rule across all the regions then a compromise that does not put such a burden on generators and adversely impact DNOs whilst still enabling ESO to have visibility of generators that have an impact on the system seems the only option, possibly by reducing changing the definition of large to 50MW or projects connected at 132kV or above across all the regions, but it is not very clear why we need to have a single rule. If we do implement the proposed approach, then there will be a number of knock-on impacts at all levels that will need to be fully considered prior to implementation.</p> | | | | |
| 4 | Do you have any other comments? | We are in support of the workgroup vote that agreed that neither of these solutions is beneficial over the baseline. | | | | |

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|---|---|--|
| 5 | Do you agree with the that GC0117 does impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code? | <input type="checkbox"/> Yes <input type="checkbox"/> No No comment. |
| 6 | Do you have any comments on the impact of GC0117 on the EBR Objectives? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Click or tap here to enter text. |