

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:	Alex Howison	
Company name:	Low Carbon	
Email address:	Alex.howison@lowcarbon.com	
Phone number:	07960261937	
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?	Mark the Objectives which you believe the proposed solution(s) better facilitates:												
		<table border="1"> <tr> <td>Original</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table>	Original	<input type="checkbox"/> A	<input type="checkbox"/> B	<input 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 type="checkbox"/> D	<input type="checkbox"/> E
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WAGCM1	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E									
<p>We do not believe that either option presents any improved facilitation of the Objectives.</p> <p>There are good reasons why the threshold for defining a Large Power Station is lower in Scotland vs. England and Wales, not least that the minimum transmission voltage in Scotland is 132kV, whereas in England and Wales it is 275kV.</p> <p>This means that the smallest transmission-connected generators in Scotland are typically smaller than those in England and Wales.</p> <p>Access arrangements are also different for transmission-vs. distribution-connected generators. This proposal would introduce major changes for distribution-connected generators in England and Wales; these changes need to be considered more holistically alongside other potential changes to access rights for distribution-connected generators.</p> <p>We do not believe that the Proposer has sufficiently demonstrated the detriment from the current arrangements, nor the benefits that will arise from the proposed changes.</p> <p>If these reforms are beneficial, then they should be applied retrospectively to existing generators as well. The current Proposal would create a two-tier system of generators depending on when they applied for a connection, which is disadvantageous.</p> <p>In addition, the required changes to connections to operate as BM Units and the subsequent reconfiguration of ESO systems could present an unjustifiable increase of costs to both the ESO and to affected generators, especially when considering the lack of benefit in facilitation of the Objectives.</p> <p>As such Low Carbon suggests the Authority reject this modification in its entirety.</p>														

2	Do you have a preferred proposed solution?	<input type="checkbox"/> Original <input type="checkbox"/> WAGCM1 <input checked="" type="checkbox"/> Baseline <input type="checkbox"/> No preference
		Click or tap here to enter text.
3	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		Click or tap here to enter text.
4	Do you have any other comments?	As above, Low Carbon supports the rejection of this modification proposal.
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		Click or tap here to enter text.
6	Do you have any comments on the impact of GC0117 on the EBR Objectives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		We agree with the workgroup that neither the Original or WAGCM1 proposals better facilitates any of the EBR objectives when compared to the current baseline.