

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:	Graeme Vincent	
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Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input 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 checked="" 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 checked="" type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</td> </tr> <tr> <td>WAGCM1</td> <td><input type="checkbox"/>A <input checked="" type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E</td> </tr> </table> <p>Both modifications better facilitate Applicable Objective B in that they both harmonise the definitions of Small, Medium and Large across Great Britain for new connections from 2027. However, as they are not retrospective, they simply replace one defect with another, as existing generators will be treated differently from those connecting from 2027 onwards. The proposed solutions also result in a more complex data exchange scenarios for Network Operators to manage under their Grid Code obligations.</p>	Original	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E	WAGCM1	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
Original	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E					
WAGCM1	<input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input 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 overall benefits of the proposed modifications have not been sufficiently demonstrated in our view. Whilst it is clear that the transmission and distributions system have fundamentally changed since the existing definitions were introduced at the time of BETTA in 2005 and a rethink is needed, the proposals as drafted do not fully address the perceived deficiency.</p> <p>The proposals also need to be considered within a wider strategic context as the industry develops and evolves to meet the needs of developing and operating a net zero system. Changes therefore should align with wider industry initiatives which are aimed at improving the coordination and planning of the system as we move to net zero such as the establishment of the National Energy System Operator (NESO) and its new roles, the evolving role of Distribution System Operators (DSOs) and those arising from the work of the Open Networks project.</p>				
3	Do you support the proposed	<p> <input type="checkbox"/>Yes <input checked="" type="checkbox"/>No </p>				

	implementation approach?	As we are not supportive of the either of the proposed modifications and prefer to maintain the baseline we do not support the proposed implementation approach.
4	Do you have any other comments?	No.
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 Although no changes are being made to the actual Article 18 terms within the Grid Code (BC1 and BC2), the changes which are being made ill mean that additional parties will be captured by the requirements of these sections so it is right that the interaction is highlighted
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.