

Workgroup Consultation Response Proforma

GC0159:

Introducing Competitively Appointed Transmission Owners

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 15 February 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 Ruth Roberts ruth.roberts@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Graeme Vincent
Company name:	SP Energy Networks
Email address:	Graeme.vincent@spenergynetworks.co.uk
Phone number:	07753 622336

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:

- 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*

- 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 Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E</p> <p>Click or tap here to enter text.</p>
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Yes, we agree with the proposed implementation approach, although it would be prudent to await the passage of the enabling legislation before submission of the modification report to the Authority – and thereby ensure that any nuances which may arise during the passage of the legislation or changes from the original assumptions can be captured in the proposed solution. Capturing CATOS within the definition of Relevant Transmission Licensees ensures that they are treated, in respect of the Grid Code, in the same manner and are subject to the same requirements as the existing onshore Transmission Owners. This will maintain a level playing field across onshore electricity transmission owners in a competitive environment.</p>
3	Do you have any other comments?	Click or tap here to enter text.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>

Specific Workgroup Consultation questions		
5	The Grid Code does not specify how TOs initially form/create their RES. Noting the workgroup discussion on this point, do you have a preferred approach that CATOs might follow to do this?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>We believe that it is the responsibility of the individual transmission owner to determine and establish what a relevant suite of standards for connection to its network are. Only in this way can the CATOS be truly considered as a competitively awarded transmission owner as they will face the same requirements that the existing onshore</p>

		<p>Licensees have to meet. These standards should be subject to the existing governance mechanisms and ensure that there is no detriment to the safe and reliable operation of the existing NETS. We note that the RES themselves do not cover any TO-TO interaction and that this, where required, will be covered by separate modifications to the System Operator – Transmission Owner Code (STC).</p>
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