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Code Administrator Consultation Response Proforma

GC0164: Simplification of Operating Code No.2

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@nationalenergyiso.com by **5pm GMT on 16 January 2025**. 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 grid.code@nationalenergyiso.com

Respondent details	Please enter your details	
Respondent name:	Alan Creighton	
Company name:	Northern Powergrid	
Email address:	alan.creighton@northernpowergrid.com	
Phone number:	07850 015515	
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 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** (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)

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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);*
- 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?	<div>Mark the Objectives which you believe the proposed solution(s) better facilitates:</div> <div>Original <input type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input checked="" type="checkbox"/>E</div> <div>Click or tap here to enter text.</div>
2	Do you have a preferred proposed solution?	<div><input checked="" type="checkbox"/>Original</div> <div><input type="checkbox"/>Baseline</div> <div><input type="checkbox"/>No preference</div> <div>Click or tap here to enter text.</div>
3	Do you support the proposed implementation approach?	<div><input checked="" type="checkbox"/>Yes</div> <div><input type="checkbox"/>No</div> <div>Click or tap here to enter text.</div>

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4	Do you have any other comments?	<p>We are concerned that scarce industry resources have been used developing this modification and the benefits seem to be intangible, however given that this resource has been spent, it is reasonable to implement the proposed changes. We think that there should be a wider debate amongst stakeholders about the learning arising from development of his modification, and the extent to which it delivers net benefits to industry, before initiating further modifications to simplify other parts of the Grid Code. The thorny issue of terms in the Glossary and Definitions, particularly those relating to generation, is still be resolved.</p> <p>We would also like to make numerous editorial and referencing comments on the parts of the Grid Code listed below.</p> <ul style="list-style-type: none"> • OC2 • PC • DRC <p>Marked up versions of these parts of the Grid Code form an integral part of our consultation response.</p> <p>It's worth noting that the hierarchy of referencing sub-paragraphs i.e. a) ii. 1. is, in some places in OC2, not really clear particularly where sections are referenced in the body of the text.</p>
5	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>