

Workgroup 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@nationalgrideso.com by **5pm on 08 June 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 grid.code@nationalgrideso.com

| Respondent details | Please enter your details | |
|--|--|--|
| Respondent name: | Antony Johnson | |
| Company name: | National Grid ESO | |
| Email address: | Antony.Johnson@nationalgrideso.com | |
| Phone number: | 07966 734856 | |
| Which best describes your organisation? | <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network <input type="checkbox"/> Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" 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 Workgroup, Panel or the industry for further consideration)

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);*

- 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 Workgroup Consultation questions | | | | | | | | |
|---|--|---|---------------------------------------|---------------------------------------|---------------------------------------|---------------------------------------|----------------------------|---------------------------------------|
| 1 | Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives? | <p>Mark the Objectives which you believe each solution better facilitates:</p> <table border="1"> <tr> <td>Original</td> <td><input checked="" type="checkbox"/>A</td> <td><input type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input type="checkbox"/>D</td> <td><input checked="" type="checkbox"/>E</td> </tr> </table> <p>We agree that the proposal better facilitates Grid Code Objectives A, C and E on the basis that this modification seeks to simplify and rationalise the Grid Code drafting in respect of OC2 and we also understand this approach will be applied to other sections of the Grid Code.</p> <p>We understand that the aim of the modification is to use plain English, reduce duplication, aid navigation and improve the Grid Code for end Users. In this respect we see the Grid Code becoming more efficient and therefore are of the opinion that this proposal is positive in respect of Grid Code objectives A, C and E.</p> | Original | <input checked="" type="checkbox"/> A | <input type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input type="checkbox"/> D | <input checked="" type="checkbox"/> E |
| Original | <input checked="" type="checkbox"/> A | <input type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input type="checkbox"/> D | <input checked="" type="checkbox"/> E | | | |
| 2 | Do you support the proposed implementation approach? | <p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>We support the revised text with the additional use of flow diagrams which we believe will reduce the time required for navigation.</p> | | | | | | |
| 3 | Do you have any other comments? | Yes – See detailed comments below. | | | | | | |
| 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 | | |
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| 5 | Do you think that the changes proposed make it | Yes – Please see above comments. |

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| | easier to understand than the existing version? | |
| 6 | Do you agree that the Grid Code obligations wouldn't change if this version is implemented when comparing to the existing version? | Yes we agree that the Grid Code obligations would not change if this version were to be implemented. However, we do have some small comments which are noted below. |
| 7 | Do you agree with the Workgroup view that there should be only one set of Glossary and Definitions applicable to the entire Grid Code? | Yes – As the Grid Code is a complex document spanning many moving parts, however, for the purposes of clarity and for the end User we believe it is appropriate to only have one set of Glossary and Definitions. |
| 8 | Do you agree with the proposed change to move the position of the Generators Performance Charts from the Operating Code to the Planning Code? | Yes, however, we think there are some further areas of OC2 which relate to the Generator Performance Chart which could be moved into the Planning Code – Please see detailed comments below. |
| 9 | In order to help quantify the industry resources required to implement this type of change, please indicate the number of hours spent reading and responding to this consultation. | Five hours |
| | Additional ESO Comments | <p>General comments on legal text</p> <ol style="list-style-type: none"> 1) Because the Power Generating Modules apply to the ECCs and this is not the case in the CCs it is important to make sure that, as part of the rationalisation work, some parties have not been missed. OC2.3.1.3.2(a) (i) is an example of this. 2) As part of the rationalisation we need to make sure that nothing has been deleted in terms of the information that Interconnectors currently have to supply and may have been missed – looking at the track change marked version it is possible this may have happened. OC2.3.1.2.6(i)(4)(ii) is potentially one example of this. 3) OC2.3.1.4(a) – Ref Generators and Non-Embedded Customers should be singular – It also probably needs re-phrasing as it mixes up Generating Plant and Non Embedded Customers Plant. 4) OC2.3.1.4(e)(i) and (ii) – Some text needs de-bolding / bolding. |

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| | | <ul style="list-style-type: none">5) OC2.3.1.5(b) – Last para – Reference to Systems – should this be “outages on the Network Operator’s system”.6) OC2.3.1.6 (c) – Suggest Rephrasing to read “In respect of Embedded Offshore Transmission Systems, Network Operators shall confirm....”7) OC2.3.2 – This relates to the Generator Performance chart which I note has been included in the PC. Should some of this section also move to the PC. I note OC2.3.2.1(d) refers to Appendix 1 which I think has now been moved to the PC.8) OC2.3.2.1 (j) – I think we are using only RfG terms here and forgetting the pre RfG – ie Generating Unit as opposed to Synchronous Power Generating Module. This also applies to (iii) though worth reviewing the text to make sure we have not removed something.9) Figure 16 – There is no reference to Interconnectors – is this correct. |
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