

**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](mailto:grid.code@nationalgrideso.com) by **5pm** on **08 July 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](mailto:grid.code@nationalgrideso.com)

| Respondent details                             | Please enter your details  |  |
|--|--|--|
| <b>Respondent name:</b>                        | Mike Kay   |  |
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| <b>Which best describes your organisation?</b> | <input type="checkbox"/> Consumer body<br><input type="checkbox"/> Demand<br><input type="checkbox"/> Distribution Network<br><input type="checkbox"/> Operator<br><input type="checkbox"/> Generator<br><input type="checkbox"/> Industry body<br><input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage<br><input type="checkbox"/> Supplier<br><input type="checkbox"/> System Operator<br><input type="checkbox"/> Transmission Owner<br><input type="checkbox"/> Virtual Lead Party<br><input checked="" 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 checked="" type="checkbox"/>B</td> <td><input checked="" type="checkbox"/>C</td> <td><input checked="" type="checkbox"/>D</td> <td><input type="checkbox"/>E</td> </tr> </table> <p>Click or tap here to enter text.</p>  | Original                              | <input checked="" type="checkbox"/> A | <input checked="" type="checkbox"/> B | <input checked="" type="checkbox"/> C | <input checked="" type="checkbox"/> D | <input type="checkbox"/> E |
| Original                                  | <input checked="" type="checkbox"/> A  | <input checked="" type="checkbox"/> B   | <input checked="" type="checkbox"/> C | <input checked="" type="checkbox"/> D | <input type="checkbox"/> E            |                                       |                                       |                            |
| 2   | Do you support the proposed implementation approach?   | <p><input checked="" type="checkbox"/>Yes<br/><input type="checkbox"/>No</p> <p>Click or tap here to enter text.</p>  |                                       |                                       |                                       |                                       |                                       |                            |
| 3   | Do you have any other comments?  | <p>The modification proposed here to OC2 are appropriate and are of considerable merit in their own right. However, as a precursor to a more far-reaching simplification of the Grid Code overall, they seem to fall far short of what could have been tested through consultation, and are probably not a good basis, or even a missed opportunity, for the furtherance of the dWSTC project.</p> <p>The dWSTC project to me seems moribund. The project has uncovered a significant dilemma. Absolute legal certainty of drafting versus ease of assimilation. The current Grid Code tends towards the former, and really makes no attempt at the latter. If, as it seems, stakeholders actually want the legal certainty, then they are probably deluding themselves that a version can be created with that certainty, and which will be much easier to assimilate. That's not to say that there are not significant improvements to readability/understandability that cannot usefully be made, but these will probably end up being marginal.</p> <p>The dWSTC seems to have a number of problems to resolve:</p> |                                       |                                       |                                       |                                       |                                       |                            |

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|   |  | <ul style="list-style-type: none"> <li>• The huge cache of definitions in use in the Grid Code, many of which are nested and very confusing.</li> <li>• The internal complexity of the CC, ECC and to a slightly less extent, the PC.</li> <li>• The challenges caused by temporal issues, and the lack of a coherent approach for dealing with time limited requirements.</li> </ul> <p>The dWSTC project has probably made no progress on these and avoided exploring any of them in GC0164.</p> <p>In addition to these challenges, I do also think that NGESO has significantly under-resourced the dWSTC project, thus demonstrating a lack of commitment (in spite of apparent business plan commitments), and which is why I think it's moribund.</p> |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | <input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No<br><br>Click or tap here to enter text.   |

### Specific Workgroup Consultation questions

|   |   |  |
|---|---|--|
| 5 | Do you think that the changes proposed make it easier to understand than the existing version?  | Click or tap here to enter text.<br><br>Yes                            |
| 6 | Do you agree that the Grid Code obligations wouldn't change if this version is implemented when comparing to the existing version?            | Yes  |
| 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?        | No. This is a fundamental mistake which will hamper the dWSTC project. |
| 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  |

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|---|--|--|
| 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. | Not appropriate to answer – I have burned probably more than one hundred hours working on earlier drafts of OC2 for the dWSTC project. |
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