

**CUSC/Grid Code Code Administrator Consultation Response
Proforma****GC0131: 'Quick Win' Improvements to Grid Code open governance
arrangements**

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 **27 August 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Panel.

If you have any queries on the content of this consultation, please contact Nisar Ahmed - Nisar.Ahmed@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Alan Creighton
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For reference the applicable Grid Code objectives are:

- i.* To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity
- ii.* 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);
- iii.* Subject to sub-paragraphs (a) and (b), 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;
- iv.* 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
- v.* 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 Grid Code Original Proposal or WAGCM1 better facilitates the Grid Code Objectives?	The Original and WAGCM1 would both improve the efficient development of modifications by clarifying the process and providing additional governance flexibility. The Original Proposal seeks to change the fundamental test in the assessment of an Alternative Proposal in that the Alternative would be compared against the Original Proposal rather than the Grid Code baseline. It is unclear what the defect is that the Original Proposal addresses in this area and there is the possibility that it could adversely affect the principles of Open Governance. For this reason it is Northern Powergrid's view that WAGCM1 better facilitates the Grid Code objectives.
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No. There are a small number of minor editorial errors in the proposed legal text. These are marked on the enclosed version of 'Annex 3 - Grid Code Governance Rules I5R37_GC0131 Panel Final'