

Grid Code Administrator Consultation Response Proforma

GC0136: Non-material changes to the Grid Code following implementation of the EU Connection Codes.

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5pm** on **21 December 2020** to grid.code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be addressed to Nisar Ahmed at nisar.ahmed@nationalgrideso.com

These responses will be included within the Draft Grid Code Modification Report to the Grid Code Panel and within the Final Grid Code Modification Report to the Authority.

Respondent:	<i>Garth Graham (garth.graham@sse.com)</i>
Company Name:	<i>SSE Generation</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(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.
--	---

Code Administrator Consultation questions

Q	Question	Response
1	Do you believe GC0136 better facilitates the Grid Code Objectives? Please include your reasoning.	Yes, in respect of better facilitating Applicable Objective (e) in terms of the efficient implementation and administration of the Grid Code arrangements whilst being neutral in terms of the other four objectives (a)-(d).
2	Do you support the proposed implementation approach?	Yes, we support the proposed implementation approach set out in the consultation document.
3	Do you have any other comments in relation to GC0136?	<p>Our support for this proposal is entirely predicated on NGENSO's statement (as the Proposer) that all the changes within the proposal are non-material as per the Grid Code definition of 'material effect' namely:</p> <p><i>“An effect causing The Company or a Relevant Transmission Licensee to effect any works or to alter the manner of operation of Transmission Plant and/or Transmission Apparatus at the Connection Site (which term shall, in this definition and in the definition of “Modification” only, have the meaning ascribed thereto in the CUSC) or the site of connection or a User to effect any works or to alter the manner of operation of its Plant and/or Apparatus at the Connection Site or the site of connection which in either case <u>involves that party in expenditure of more than £10,000.</u>” [emphasis added]</i></p> <p>However, if the proposed changes set out within GC0136 are greater than £10k per party then we would not support this change as it would have been raised erroneously as it would not comply with the 'self-governance' criteria.</p>