

Grid Code Workgroup Consultation Response Proforma

GC0134: Removing the telephony requirements as part of Wider Access to the Balancing Market for small, distributed and aggregated market participants

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 by **5pm on 3 June 2020** to grid.code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Respondent:	<i>Rick Parfett, rick.parfett@theade.co.uk</i>
Company Name:	<i>The Association for Decentralised Energy (ADE)</i>
<p>Please express your views regarding the Workgroup Consultation, including rationale.</p> <p>(Please include any issues, suggestions or queries)</p>	

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0134 Original proposal better facilitate the Applicable Grid Code Objectives?	Yes. The ADE believes that GC0134 better facilitates Applicable Objectives (a), (b) and (c).
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

Specific GC0134 questions

Q	Question	Response

5	Has the workgroup considered all the issues arising from GC0134 / are there any unintended consequences of this modification?	The ADE believes that the workgroup has considered all the issues arising from GC0134.
6	Do you believe there are any other options that this workgroup has not considered?	No..
7	Do you have any other suggestions that the workgroup may not have considered to operability and security of out of hours operations?	No.
8	The workgroup believes it is appropriate for the NGENSO to consider the cost/risk/benefit of this proposal and keep this under ongoing review going forwards. Do you have any suggestions or comments?	The ADE agrees with this approach but would highlight that some of the benefits of GC0134 (e.g. increased market entry from smaller participants, thereby increasing liquidity) will take some time to manifest themselves. Nevertheless, these benefits are real and will promote competition and efficiency in the medium term. It is essential that any cost/benefit analysis recognises this and is not just based on benefits to current market participants but includes future ones too.
9	Would this solution help facilitate you entering the Balancing Mechanism? If so, what volume would you anticipate offering into the Balancing Mechanism?	A number of ADE members have indicated that this solution would be helpful in facilitating entry to the Balancing Mechanism.s
10	For those already in the Balancing Mechanism, would this solution encourage you to stop providing 24/7 Control / System Telephony coverage? If so, approximately what volume do you currently offer into the Balancing Mechanism?	N/A
11	Do you see any issues with the thresholds per unit or in aggregation?	The ADE believes that the thresholds are set at sensible levels.
12	Would you propose any alternative thresholds and what is your rationale?	No.
13	In order to implement this change are there any	No.

	compromises which need to be made?	
14	Do you believe there is an alternative method for contingency dispatch which could provide at least the same level of reliability, resilience and accuracy as fixed telephony?	No.