

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>Sean Cleary, scleary@spenergynetworks.com, 0141 614 2905</i>
Company Name:	<i>Scottish Power Energy Networks (SPEN)</i>
<p>Please express your views regarding the Workgroup Consultation, including rationale.</p> <p>(Please include any issues, suggestions or queries)</p>	<p>At SPEN DSO, our purpose is to deliver the safe, efficient, reliable and decarbonised operation of the distribution network and wider energy system at least cost to customers. We strongly believe in removing barriers for generators to compete in balancing markets, and seek to assist market players (generators/aggregators/system operators) where possible.</p> <p>However, we share some concerns over system reliability if the consequence of this modification results in a sizeable number of participants removing their 24/7 telephony capabilities. We believe that the CBA conducted by NGENSO, together with the feedback from generators from this consultation, will highlight if this is a significant risk.</p> <p>As a DSO we believe we can help. We have 24/7 telephony capabilities via our control room. We also have the ability to dispatch and control units via our ANM system (which we expect to roll-out across our entire SPD and SPM areas within the next couple of years). We would be willing to help generators who cannot afford to staff their trading desk 24/7. We would not take any commercial decisions ourselves, all actions would be pre-determined by the generator – we would simply enact these decisions if called upon by the system operator. We believe this is a credible solution that will help mitigate some of the risks associated with the modification, and will also promote a system-wide approach to network operation.</p>

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Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0134 Original proposal better facilitate the Applicable Grid Code Objectives?	<p><i>For reference the applicable Grid Code objectives are:</i></p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p>We believe that the results of the CBA conducted by NGESO will be critical for this – if enough new sites sign-up to the service that will give NGESO added benefit, compared to the level of overnight MW capability they will lose during system failures, then we would agree with the modification change. As described above, NGESO should consider DSO involvement via our telephony/ANM capabilities which could reduce this risk.</p> <p><i>(ii) to facilitate 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);</i></p> <p>This should increase competition by removing a cost-barrier to entry, and in theory reduce balancing costs (and costs to the consumer) as a result.</p> <p><i>(iii) 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;</i></p> <p>A coordinated whole system approach is required in a fully functioning transmission and distribution network. The modification could potentially reduce the resilience of the distribution network hence the importance for DSO to be involved in reducing this risk.</p>

2	Do you support the proposed implementation approach?	We accept the urgency of generators to implement this change as quickly as possible. We assume that this urgency will not negatively impact the CBA that is essential to validate this modification.
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?	A potential consequence to generators who only offer office hour telephony capability is that they may be unintentionally hindered in the Balancing Mechanism. Although the majority of balancing instructions are conducted electronically, the ENCC does build working relationships with generators via the telephone, and will often use this as a way to check availability etc This fact may be unknown to new sites looking to connect to the network and should be made clear to them when deciding if they would like to operate telephony service during office hours only.
6	Do you believe there are any other options that this workgroup has not considered?	As above, the DSO should be considered to provide assistance, helping maintain system security and resilience.
7	Do you have any other suggestions that the workgroup may not have considered to operability and security of out of hours operations?	As above.
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 impact of this change on other NGENSO services (frequency response; STOR, Fast Reserve etc) should be considered – will this change reduce the ability of these services to function during times of system failure. Generators must also be told if their lack of 24/7 telephony capabilities will reduce the likelihood of them being accepted to provide these services.
9	Would this solution help facilitate you entering the	N/A

	Balancing Mechanism? If so, what volume would you anticipate offering into the Balancing Mechanism?	
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?	No, the limits seem sensible.
12	Would you propose any alternative thresholds and what is your rationale?	No.
13	In order to implement this change are there any compromises which need to be made?	No compromises should be made that could potentially impact on system security/resilience.
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?	As above, DSO control room via ANM.