

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>Tione Mtalimanja</i> Tione.Mtalimanja@edfenergy.com 07384 530271
Company Name:	<i>EDF</i>
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<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><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><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><i>(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</i></p> <p><i>(v) To promote efficiency in the implementation and administration of the Grid Code arrangements.</i></p>

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0134 Original proposal better facilitate the Applicable Grid Code Objectives?	EDF believes that modification GC0134 could better facilitate objectives (i), (ii) and (iii), subject to cost, risk and benefit analysis in particular we would want an assurance from the ESO that the level of resilience is not degraded, recognising that increasing volumes of small users could have a significant impact on system security.
2	Do you support the proposed implementation approach?	Yes, subject to our comments in Q1
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?	As stated in Q1 above, EDF believes that there are outstanding issues to be addressed.
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 NGESO to consider the cost/risk/benefit of this proposal and keep this under ongoing review going forwards. Do you have any suggestions or comments?	EDF supports the approach suggested by the workgroup for a further review. EDF is of the view that the review should include the system security risk posed by the inability of the ESO to access BM participants at any time if required. The review should also include the interactivity with GC0143 which aims to increase ESO access to embedded non-BM participants through DNOs.

9	Would this solution help facilitate you entering the Balancing Mechanism? If so, what volume would you anticipate offering into the Balancing Mechanism?	N/A
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?	EDF would like to see the results of cost, risk and benefit analysis as mentioned in Q1 above before taking action on 24/7 control
11	Do you see any issues with the thresholds per unit or in aggregation?	EDF believes that a cost, risk and benefit analysis would determine if the thresholds are economic and efficient and with no degradation to level of system resilience
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
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