

**Code Administrator Consultation Response Proforma****GC0134: Removing the telephony requirements for small, distributed and aggregated market participants who are active in the Balancing Mechanism**

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](mailto:grid.code@nationalgrideso.com) by **5pm** on **07 June 2021**. 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](mailto:Nisar.ahmed@nationalgrideso.com) or [grid.code@nationalgrideso.com](mailto:grid.code@nationalgrideso.com)

Respondent details	Please enter your details
<b>Respondent name:</b>	Shanelle Millage-Chancellor
<b>Company name:</b>	energy24 Limited
<b>Email address:</b>	Shanelle.millage-chancellor@pxlimited.com
<b>Phone number:</b>	07912299190

**I wish my response to be:**

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

*Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.*

**For reference the Applicable Grid Code Objectives are:**

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- 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 GC0134 Original Proposal or better facilitates the Applicable Objectives?	No. energy24 Limited believes that there are enough options and alternatives available, such as the services provided by energy24 Limited, to market participants, to fulfil the existing requirements.
2	Do you support the proposed implementation approach?	No.
3	Do you have any other comments?	We disagree with the position that the current telephony requirements present a barrier to entry. This claim assumes that the telephony requirements can only be met in-house rather than being outsourced to a company, such as energy24 Limited, which is capable of providing this service to new entrants and existing participants. The fees for this service are affordable and highly unlikely to create to a barrier entry. The proposal recommends changes that are not necessary and creates a risk that system resilience would be reduced.