

National Grid ESO
via email: box.wholesystemcode@nationalgrideso.com

12 November 2021

Dear Sirs,

Digitalised Whole System Technical Code Consultation 1

EDF is the UK's largest producer of low carbon electricity. EDF operates low carbon nuclear power stations and is building the first of a new generation of nuclear plants. EDF also has a large and growing portfolio of renewables, including onshore, offshore wind and solar generation, and energy storage. With around five million electricity and gas customer accounts, including residential and business users, EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the opportunity to respond to this Digitalised Whole System Technical Code Consultation 1 (WSTC). We believe that a whole system approach, which encompasses both transmission and distribution systems, is becoming increasingly important for the reliability and operability of the electricity system, as we move to a net zero emissions position. Merging and digitalising the technical codes could form an important enabler for a whole system approach, therefore, we agree that it is an activity that should be considered. We note that Phase 1 of this project is expected to conclude by 31 March 2022 and focuses on stakeholder engagement to confirm the project scope. We are not, at present, in a position to address the detailed questions set out in the consultation document, but, instead, would like to make the more general points that follow.

- It is important that this WSTC workstream is fully integrated with the Ofgem and BEIS Energy Codes Reform (ECR) work. Code reform, including WSTC, will be a major process, requiring a large amount of resource. There will inevitably be a call on the same, limited resources across all of the codes in scope. The ECR work should prioritise and programme the work to be done across all of these codes.
- The consultation document has included key benefits from the WSTC work, such as increased market participation. The document also describes a range of solutions with incremental levels of digitalisation and consolidation. It would be very helpful to quantify to some extent the costs of the various solutions and the specific benefits provided by each solution. It would be expected to input this type of analysis into the ECR work.
- If the consolidated, digitalised code were not to become the legally enforceable code, but only a guidance tool, then users would still have to rely on the original code documents,

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thus negating many of the benefits from the work. However, we recognise that there would clearly be considerably greater resources required to produce a reliable, legal WSTC.

- The governance structure set out in the consultation is similar to the present code modification arrangements, with the addition of a stakeholder group between the workgroups and the review panels. There is a high risk that the WSTC would be such a significant amount of work that the industry would not be able to fully support the workgroups and stakeholder group.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact me or Andy Vaudin at andy.vaudin@edfenergy.com.

Yours faithfully

A handwritten signature in black ink that reads 'Mark Cox'.

Mark Cox
Head of Nuclear & Wholesale Policy and Regulation