

Code Administrator Consultation Response Proforma

GC0158: Reversing unimplemented aspects of GC0068

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 by **5pm on 03 October 2022**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Milly Lewis milly.lewis@nationalgrideso.com or grid.code@nationalgrideso.com.

Respondent details	Please enter your details
Respondent name:	Alastair Frew
Company name:	Drax
Email address:	Alastair.frew@drax.com
Phone number:	07730697290

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:

- a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity
- b) 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);
- c) 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;
- d) 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
- e) 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 Code Administrator Consultation questions		
1	Do you believe that GC0158 Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the Original Solution better facilitates:
		Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E
		No, the original GC0068 report and the Authorities decision letter clearly states there were benefits in implementing GC0068 to grid code objectives a, b & c which this modification is unwinding, so this modification cannot be better facilitating these objectives.
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		It is not clear why parts of GC0068 are not being implemented when originally the proposer said all these items would be included in the EBRs at no cost but now it this modification is saying there is a £3,000,000 cost. It is not clear who is saving the £3,000,000? Is this a cost which would have been passed straight on to customer or is this an internal ESO saving by not carrying out the works.
3	Do you have any other comments?	<p>Whilst the GC0068 modification was not intended to remove faxes it was intended to introduce “a greater range of data and instructions to be exchanged by electronic means” [panel paper PP13/03] which would then allow participants to reduce their requirements for faxes. All reactive power instructions are still being sent by fax along with other instructions and it is difficult to see how this situation cannot be resolved. The ESO have recently suggested that they want raise a new modification to remove faxes from the code entirely which would be relatively simple if GC0068 had been implemented, but now it will have to reintroduce parts of GC0068, but even then will the ESO be capable of doing this or will it be to expensive. It does seem strange the ESOs new commercial products can be interfaced electronically but they are unable to get all the operating instructions into electronic dispatch. So, are we stuck with faxes forever more?</p> <p>Also panel paper PP13/04 states “this paper also proposes removing the requirement on Generators under BC1.4.2(e) to submit Day Ahead Dynamic Data to National Grid as this data is no longer used.” This requirement is still in the code and will now be retained</p>

		with this modification although it was identified 9 years ago the data was not used.
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