

# Alternative request Proposal form

Grid Code

Modification potential alternative submitted to:

What stage is this document at?

## GC0106 [WACM3]

- 01 Proposed alternative
- 02 Formal Workgroup alternative

**Mod Title:** As per original (i) TSO to provide where DSOs/SGUs do not provide and (ii) Ensuring a non-discriminatory approach by the TSO to data provision as well as a 'level playing field' between relevant stakeholders.

**Purpose of alternative Proposal:** As per the Original.

**Date submitted to Code Administrator:** 9<sup>th</sup> May 2018

**You are:** A Workgroup member

**Workgroup vote outcome:** Formal alternative



### Any Questions?

Contact:

**First Last**

Code Administrator



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### Contents

1	Alternative proposed solution for workgroup review.....	2
2	Difference between this proposal and Original .....	3
3	Justification for alternative proposal against Grid Code objectives .....	3
4	Impacts and Other Considerations.....	4
5	Implementation .....	4
6	Legal Text.....	4

*Should you require any guidance or assistance with this form and how to complete it please contact the Code Administrator at [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com)*

## 1 Alternative proposed solution for workgroup review

During the assessment of the GC0106 Original proposal questions arose as to:

(i) the legal position with respect to the form of words that appear in:

Articles 44 and 51 (concerning DSOs);  
Article 47 (concerning SGUs);  
Articles 48, 49 and 50 (concerning power generating facility owners of a power generating module which are an SGU);  
Article 52 (concerning transmission connected demand facility owners); and  
Article 53 (concerning distribution connected SGUs which participate in demand response to third parties).

And

(ii) a non harmonised and discriminatory approach to data exchange was to be applied.

Formal WACMs have been raised for each of these two aspects, with item (i) being specifically address in WACM1 and item (ii) being specifically addressed in WACM2.

However, both WACM1 and WACM2 are stand alone proposal.

This WACM3 Alternative is simply a combination of the WACM1 approach in terms of the TSO to provide where DSOs/SGUs do not provide and WACM2 in terms of ensuring a non-discriminatory approach by the TSO to data provision as well as a 'level playing field' between relevant stakeholders.

For the avoidance of doubt the 'note' at the end of Section1 of WACM2 – see below<sup>1</sup> – is, for obvious reasons, the only part of WACM2 that does not apply in terms of WACM3

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<sup>1</sup> Note: This WACM2 assumes that all other aspects of the GC0106 (Original) applies and this means that the 'TSO to provide where DSOs/SGUs do not provide' matter (set out in WACM1) would not apply to this WACM2.

For the avoidance of doubt, this would mean that if the TSO, for example, 'provided' that Type C generators did not need to provide, as per Article 47 (1) (c), "*in the case of power generating facility with consumption other than auxiliary consumption net active and reactive power*" then no Type C generator in GB would need to provide this real time data item.

However, with WACM2, it would not permit the TSO to adopt a non harmonised and/or a discriminatory approach in terms of the TSO 'providing' that certain Type C generators would, and some Type C would not, need to provide (in this example) this real time data item."

## 2 Difference between this proposal and Original

This Alternative proposal will use all the same changes in the original GC0106 proposal except where (i) the Original proposal deals with the provision (or non-provision) of the data items related to the Articles listed in WACM1 and (ii) where the Original proposal deals with the data items related to the Articles listed in WACM2, where this Alternative proposal will make it clear that a harmonised and non-discriminatory approach (as detailed in WACM2) will be applied (rather than the GC0106 Original approach).

## 3 Justification for alternative proposal against Grid Code objectives

The justification for this Alternative proposal is as set out in WACMs 1 and 2.

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Positive
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)	Positive
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	Positive
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	Positive
To promote efficiency in the implementation and administration of the Grid Code arrangements	Neutral

## 4 Impacts and Other Considerations

As per the Original.

*Consumer Impacts*

As per the Original.

## 5 Implementation

As per the Original.

## 6 Legal Text

As per the Original, except with respect to those Articles as set out in WACMs 1 and 2.

[end]