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Dear ENA colleagues

Open Networks Programme – Consultation on High Level Scope for 2022

My comments on the scope are confined to WS1a and have been prompted by the Grid Code Modification GC0117. This modification is aimed at removing the different thresholds in the north of Scotland, the south of Scotland and the rest of England Wales at which an embedded generator needs to become an accessory to the CUSC and comply with the Grid Code. As you are probably aware the current thresholds are 10MW in the north of Scotland, 30MW in the south of Scotland, and 50MW in the rest of GB. Within the development of this modification NGENSO are proposing that the threshold should be 10MW across the whole of GB. Of course, this would be a big change for all embedded generation everywhere apart from in the north of Scotland.

In GC0117 NGENSO are promoting the 10MW threshold as they say it would give them significantly more visibility of embedded generation, and the ability to control it.

In relation to NGENSO's visibility of embedded generation and DER, more generally, it is not clear in arguing for this threshold that NGENSO colleagues in the GC0117 work are properly aware of work to date in WS1b P6, nor its likely conclusion and report to Ofgem. As I understand it the eventual successful implementation of the likely recommendations in P6 can be expected to solve NGENSO's concerns about visibility.

However to date, there does not appear to be a shared strategic view of how NGENSO, without their proposed 10MW threshold in GC0117, will effect control over a large range of embedded assets, and of course, particularly those above the 10MW threshold. Clearly there is much good historic work in WS1a related to the co-existence of DNOs' use of flexibility with NGENSO's needs – but it seems that work has focussed on making DNO's use not conflict with NGENSO's historical or current approach and needs. It does not seem that NGENSO's strategic balancing needs figure prominently in the work to date.

Conversely it is now very encouraging to see both the emergence of WS1a P0 and the focus that P3, and possibly P5, bring to this challenge. I think the details of these products would be significantly enhanced if the challenges that NGENSO are articulating in GC0117, particularly relating to operability, were included in their scope as specific needs that WS1a will address.

Without such a strategic consideration of the differing flexibility needs of both NGESO and DNOs, there is a risk that GC0117 will precipitately move the CUSC and Grid Code compliance boundary down to 10MW, simply to effect control of generation and DER embedded in DNO's systems via the existing balancing mechanism, rather than through a more strategic development route through Open Networks.

I note that on page 11 of the consultation you suggest that P0 is not a resource intensive product. If you accept my suggestion that more needs to be done to understand strategically how NGESO's emerging needs, and any implications for the balancing mechanism and embedded generation are to be addressed, this might turn out to be a little more than just "light touch".

Yours sincerely

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