

REA Response to BEIS Review of the Energy Codes consultation

Introduction & Context

The REA is the largest trade body in the UK for renewables and energy storage as well as covering Electric Vehicles and recycling, with over 550 corporate members and 1,200 more in our subsidiary company RECC.

The proposals to reform the Energy Codes system are in our view generally welcome and overdue.

The REA fully supports this review, as the codes are currently extremely complex, lengthy and the governance process for them is problematic. We support the option of an integrated Code Manager and Strategic oversight body to allow for a joined up and coordinated approach to making the changes required to the system, which may not be as well served by separating the functions. The new Body should be proactive as well as quicker to respond to changes to the system. The proposed approach of drawing on a 'bank' of experts could be effective, but must ensure that new approaches and thinking is not locked out as a result.

This review provides a positive step in the right direction towards ending barriers to new renewable capacity and energy storage on the system and enabling the energy system transition, therefore we strongly support the intentions of the review, while recognising the need for an appropriate solution and inherent level of complexity in the system.

The review should also support the delivery of the Smart Systems and Flexibility Plan, a roadmap for flexibility services that could save the UK over £8 billion by 2040, therefore forming an essential element in the transformation of the UK's energy system, and the Body should have the decarbonisation of the energy system as one of its overriding aims.

Moreover, the power cuts seen across England and Wales on the 9th August 2019 served to highlight the capabilities and potential for energy storage to 'keep the lights on' and secure the UK's electricity supplies, by responding within fractions of a second to power outages and providing artificial inertia for the system.

National Grid ESO have said that they will be capable of running a zero carbon electricity system by 2025 and flexibility assets will be central to helping enable this.

Code Review Scope

We support the reduction in the number of grid codes to a core set of rules governing set aspects of operating the network, from the current 15 to the proposed 3-4 codes.

Summary

The REA support the proposed review of the Energy Codes. We believe a more streamlined approach with better governance procedures is necessary and should be achievable, while recognising the inherent complexity in the system that will result in a certain level of rule requirements. We support the option of an integrated Code Manager and Strategic oversight body to allow for a joined up and coordinated approach to making the changes required to the system.

Please do not hesitate to contact us ([Frank Gordon](#), Head of Policy) to discuss any of the content in this response further.

REA, September 2019