

DCRP_19_05_02a		Subject:	Grid Code Review Panel
		Author:	Alan Creighton
		Date:	27 June 2019

All

Below is my DAR from the Grid Code Review Panel meeting. Key points to note include:

- TERRE Implementation has been delayed. NGESO are applying for a 6 month derogation. This is expected to have implications for the prequalification process timescales
- Several discussions relating to concerns about the code governance process, stakeholder participation, quality of the Reports to the Authority etc. and the general need to improve the change process.
- GC0096: Storage. Panel agreed to ask the WG to address some concerns that had emerged from the CA consultation.
- GC107/113: Information transparency. Two Alternatives submitted to limit the DNO impact
- GC0125: Black Start for Interconnectors. WG consultation closes 12 July
- GC0127/8: These modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the System Defence Plan (SDP) and System Restoration Plan (SRP). There are uncertainties here re who the obligations fall to (which SGUs) and if there are SGUs embedded in Distribution networks, there could be a need for an associated Dcode modification. Ofgem have provided comments on the two plans and these will need to be updated by NGESO.
- The updated RES re Communication Standard was published on 17June
- CA had published helpful clarification re who should produce the legal text for a modification – NGESO
- CA had published some thoughts on reforms to the Codes and Code Governance process.

Other interesting snippets highlighted in yellow

Regards Alan

Attendees:		Apologies:	
Trisha McAuley	Code Admin Chair	Colm Murphy	NGESO
Alan Creighton	DNO	Chris Smith	NG New Ventures (OFTO)
Gurpal Singh	Ofgem	Ross McGhin	NGET TO (Onshore)
Alastair Frew	Generator Drax	Guy Nicholson	Generator
Matthew Bent	NGESO Code Admin	Graeme Vincent	DNO (Alternate)
Rob Wilson	NGESO (Alternate)		
Rob Longden	Supplier		
Joe Underwood	Generator EUK		
Andy	NG New Ventures (Alternate)		
Steve Cox	DNO		

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Nadir Hafeez	Ofgem	
Richard Woodward	NGET TO (Alternate)	
Paul Mullen	NGESO Code Admin	
Damian Jackman	Generator SSE	
Sigrid Bolik		
Jeremy Caplin	BSC Elexon	

Issue	Paper No:	Summary
1 & 2 Welcomes		•
3 Minutes & Action log		<ul style="list-style-type: none"> Minutes agreed subject to clarifications from AF and GH 213 MB to circulate Governance Rule GR.22.4 around the Panel. On agenda Rachel Hinsley is progressing and will be circulated off line. 214 To raise a modification to resolve all housekeeping. Now planned for October GCRP, due the E&R Modifications. 222 GH to develop the timeline and report back to the Panel with when the IT system changes will be implemented re GC0126 WG meeting – EBS implementation is due in November 2019 – although this may be delayed further. 223 GH was the GC103 chair but has a new role in the TO, so MB proposes to be chair and see if there needs to be an independent technical chair (from SO). RW to be the ESO member. Mike Lee has joined the WG. 232 GC0127 - RWS to update the front page of the modification form to provide further clarity in relation to affected users including whether all storage users are affected or just SGUs. Further clarity provided on the website. 236 RWS agreed to clarify whether Article 48 is being dealt with elsewhere after reviewing the code mapping. Further clarity is required, ongoing as part of GC0127/128. 243 The Panel to review the Plan on a Page spreadsheet and provide any comments or feedback on this to JH through the Grid Code or CUSC email addresses. On agenda 244 GC114 - National Grid ESO to confirm that the specific products for submissions have been sent to Ofgem and if not when they are expected to be sent to Ofgem. Frequency product team will include GC114 requirements as new tenders are issued. TERRE go live date seems to have been delayed in some countries. RTE (French TSO) are late delivering their IT solution which is affecting GB participation. NGESO is requesting a derogation to defer the implementation Go Live from December 2019 to June 2020 to align with the French TSO timeline. Other EU countries are ready and the market will start in those countries. AF wondered if may affect the prequalification date.

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		<p>Action for NGESO to provide clarity off line.</p> <ul style="list-style-type: none"> 245 National Grid ESO to keep Ofgem aware of this updated mapping exercise in relation to the E&R mods. Mapping sheet sent. Close 246 Code Administrator to look into quoracy as a whole and present back to Panel a cross code view on what can be done to resolve this barrier. On agenda. 247 Code Administrator to provide Energy UK with an email to send out to seek further nominations for GC0126. Complete. 248 Code Administrator to contact Ofgem to discuss GC0126 lack of quoracy. Discussions between NGESO and Ofgem re proceeding directly to CA consultation if there is insufficient interest from Industry. Likely to be acceptable. 249 Code Administrator to provide the Panel with an update on different people from different entities within the same organisation being involved in the same Workgroup. NGESO are comfortable with the present arrangements. 250 RW to propose revised approach for Panel to consider re: prioritisation. On agenda 251 Code Administrator to send out the prioritisation spreadsheet to the Panel Members. Complete 252 Code Administrator to provide guidance clarifying our commitment to meet the recommendations SSE proposed and clarify the checks Code Administrator will undertake. CA has drafted a note and will email when it's complete. Relates to Critical Friend Guidance. 253 Code Administrator chairs to ensure Workgroup members are aware of their responsibilities in terms of commitment to attending meetings and using alternates where possible. To be stated at the start of each WG and included in the ToR. 254 Code Administrator to ensure Workgroup members are aware of agreed Panel position re: quorate meetings becoming non-quorate within three weeks of its planned date. ESO view is that WG meetings will still be cancelled 24 hours before the meeting, and they will encourage WG members to turn up, use alternates, have more WG members on the WGs etc. SC & AF both concerned that this may not be efficient. NGESO are looking at removing the concept of quoracy, provided that the correct members are on the WG and the Panel is happy. These will be presented at the July GCDF. The challenge is the need for a fair representation from Industry. CA hopes that these are quick wins as if not this may be within the scope of the BEIS Energy Code review. BEIS are concerned that progress on changes is slow – balance between engagement and transparency. Agreement that GCRP members aren't happy with WG meetings being cancelled at short notice and that they should be planned well in advance. CA to reconsider. 255 Code Administrator to review feedback provided by Panel on proposal forms and ascertain what improvements

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		<p>can be made to form or guidance around this. Ongoing</p> <ul style="list-style-type: none"> • 256 GS to feedback to Codes Review team the issues faced around quoracy. Complete. • 257 Code Administrator to highlight to National Grid ESO internal teams the concerns raised on the proposed Fast Fault Current Injection 2 (FFCI/VSM) Modification and that National Grid ESO need to provide an update. NGESO are to complete the studies by the end of Q3 2019 • 258 PM to provide a written update on each deferred action and present back at June Panel. Ongoing – CA to confirm that will be picked up in the Customer Journey work. • 259 CS to provide an email to Code Administrator requesting National Grid ESO to explore more on the misalignment. National Grid ESO to respond at July Panel. Ongoing
4 Chairman's Update		<ul style="list-style-type: none"> • Lesley Nugent of Ofgem and TM had a catch up process discussion recently. There had been several 'send backs' from Ofgem to CUSC for CMPs – because the root cause of the defect wasn't obvious ie an underlying quality issue. • Regular Chair / Ofgem discussions. All Chairs prob need to meet regularly with Ofgem. • Interdependence between modifications needs to be considered.
5 Authority Decisions		<ul style="list-style-type: none"> • Nothing outstanding
6 New Modifications		<ul style="list-style-type: none"> • None
7 In Flight Modifications		<ul style="list-style-type: none"> •
7 'Blocker'		<ul style="list-style-type: none"> • GC105/117 CA resources blockers. E&R related mods are priority
7 GC0103 Harmonisation of standards		<ul style="list-style-type: none"> • The proposers preferred solution was for the Scottish TOs to adopt the E&W (NGET) RES and highlight any justifiable variations. But the proposer has had a change of mind and prefers the SP RES format as the starting point as they refer to the IEC standards • This change of direction causes a problem for NGET(TO) as they need to review all the RES documents (20+) and decide if they could adopt the SP RES approach. However the DNOs and other Users are also affected by the NGET RES and this could have implications for DNOs. Potentially there could be a raft of RES documents being issued for approval in a 20 day period – although the RES documents may be substantially smaller than the present suite if they refer primarily to IECs. • There may be a need for ENA to review for consequences for ENATS for equipment installed in an NGET busbar zone • More complex than previously thought. No date for the next meeting has been set
7 GC0105 Incident Reporting		<ul style="list-style-type: none"> • No progress recently – likely to be delayed further.

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7 GC0107/0113 DCC/ RfG Transparency		<ul style="list-style-type: none"> • MK has submitted some WAGCMs related to the impact on DNOs • 10 July meeting
7 GC0109 The open, transparent, non-discriminatory and timely publication of the various GB Electricity Warnings or Notices		<ul style="list-style-type: none"> • Likely to be delayed further due to the volume of comments received.
7 GC0117 Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements		<ul style="list-style-type: none"> • Initial impact assessment complete and presented to Feb GCRP • WG report due 30 July – prob challenging • There has been some work with ENA Open Networks – discussion with ON team today • Likely to be deferred due to CA resource
7 GC0123: Clarifying references to NGET and Relevant Transmission Licensees		<ul style="list-style-type: none"> • Links to GC0120, GC0122. Following the approval of GC0122 by the Panel as fast-track self-governance in March 2019, this modification is being raised to clarify to users that certain functions performed by NGET are also performed by the Relevant Transmission Licensees and also to make other minor corrections indicated by the Panel • WG report on agenda
7 GC0125: EU Code Emergency & Restoration: Black Start testing requirements for Interconnectors		<ul style="list-style-type: none"> • This modification seeks to align the Grid Code with the European Emergency and Restoration Code, specifically in relation to Black Start testing for Interconnectors • WG consultation closes 12 July. AMC to review
7 GC0126: Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068		<ul style="list-style-type: none"> • This modification aims to progress the Profiled Stable Import and Export Limits identified in the Cost Benefit Analysis carried out on BSC P297 and GC0068, over 5 years ago. • Some parts of GC0068 were implemented, but others were not, pending full implementation of EBS. The EBS didn't deliver the means for generators to submit SEL/SIL – Stable Export / Import Limit – information. Full implementation of EBS currently on hold.

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		<ul style="list-style-type: none"> Not a DNO issue Method proposed to progress despite not being quorate – see earlier
GC0127: EU Code Restoration – Requirements resulting from System Defence Plan		<ul style="list-style-type: none"> This modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the System Defence Plan (SDP). Proposal is specifically to change the GCode to align to E&R and SDP. NGESO have published further clarity re who is an SGU Ofgem have provided feedback on the System Defence Plan and System Restoration Plan, which has been addressed by NGESO – updated plans to be submitted to Ofgem. RW offered to provide an update The Modification report needs to be with Ofgem for October so that they can make a decision in time for the December deadline. The WG report needs to come to the August GCRP – although this is challenging and as a contingency a special GCRP could be held in early September if required. This WG is combined with GC 127/128 and there will be a common Modification Report.
GC0128: EU Code Emergency and Restoration – requirements resulting from System Restoration Plan		<ul style="list-style-type: none"> This modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the System Restoration Plan (SRP). See GC0127
GC0129 EREC G5		<ul style="list-style-type: none"> Agreed to wait until the DCRP has finalised G5 following the feedback received from the DCRP consultation. Need to update the references – expected to be just a CA consultation
8 Prioritisation Stack		<ul style="list-style-type: none"> Existing prioritisation generally OK RW of the view that the prioritisation is not that transparent and too subjective with not enough clear criteria – the proposal wasn't really discussed as it seems to be more important to 'progress everything' rather than prioritise what not to progress. Action for CA to think how to increase transparency – potentially by including an initial impact statement in the Modification Proposal template – although it is important to ensure that this doesn't become a barrier. Some concern that the CA needs to secure the resource required to progress the modifications proposed by stakeholders as the clear message from stakeholders is that change takes too long. There needs to be a more efficient process to progress change
9 WG Report		<ul style="list-style-type: none"> Looked to sort out some of the residual issues associated with legal separation AF had some comments on the WG report to add clarity. No changes to the legal text. The sections changed are

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GC0123 NGET / Relevant Transmission Licensee clarification		<ul style="list-style-type: none"> the Proposers / CA. CA consultation will clarify that all relevant stakeholders were involved. Agreed that the WG has met the ToR and can go to CA consultation. Final Modification vote at the July GCRP – self-governance.
10 Draft Final Modification Report GC0096 Storage		<ul style="list-style-type: none"> Some comments had been received in the CA consultation process, which looked like they were not just editorial and needed to be addressed <ul style="list-style-type: none"> Concern about the definition of Registered Capacity and whether this is different for Import / Export. Concern that there might be a BSC modification that needs to be in place. It was agreed that there was a risk that Ofgem will send it back, so it was agreed that the report needs to go back to address the specific issues raised in the CA consultation. AMC to send any comments on the DFMR
11 Report to the Authority		<ul style="list-style-type: none"> None
12 Implementation Updates		<ul style="list-style-type: none"> GC0111 15 July GC0114 August
13 Electrical Standards		<ul style="list-style-type: none"> Communication Standards – Implemented 17 June
14 Governance		<ul style="list-style-type: none"> See above
15 GCDF		<ul style="list-style-type: none"> GCDF 10 July Oscillation damping, Governance Rules, Energy Code Thought piece, Minor changes to the Governance Rules No WG days
16 Standing Updates		<ul style="list-style-type: none"> DCRP Headline report received No JESG meeting in June, next meeting July
17 Horizon Scanning		<ul style="list-style-type: none"> OK
18 Forward Plan		<ul style="list-style-type: none"> OK
19 AOB Legal Text Guidance		<ul style="list-style-type: none"> Guidance had been published Clarify that the legal text should be included in the WG Consultation. If the proposer isn't happy with the legal text, then the Proposer should have the right to keep their preferred legal text NGESO to revise and circulate revised version (poss via GCDF)
21 AOB ESO Thought Piece		<ul style="list-style-type: none"> AMC to read and send any comments to the CA

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22 Meeting dates		<ul style="list-style-type: none"> • 30 July 2019 London • 29 August 2019 • 26 September 2019 • 24 October 2019 Glasgow • 28 November 2019 • 19 December 2019