nationalgrid

Minutes

Meeting name Grid Code Review Panel

Meeting number 13

Date of meeting Thursday 22 February 2018

Location Hilton Warwick (Webex)

Attendees		
Name	Initials	Role
Trisha McAuley	TM	Chair
Chrissie Brown	CB	Code Administrator
Naomi Davies	ND	Code Administrator
Shilen Shah	SH	Authority Representative
Nadir Hafeez	NH	Authority Representative (Observer)
Graeme Vincent	GV	Panel member
Alastair Frew	AF	Panel member
Alan Creighton	AC	Panel member
Kate Dooley	KD	Panel member
Robert Longden	RL	Panel member
Kyla Berry	KB	Panel member
Damian Jackman	DJ	Panel member
Guy Nicholson	GN	Panel member
Rob Wilson	RW	National Grid (Proposer for GC0108)
Garth Graham	GG	SSE (Proposer for GC0109)
Simon Sheridan	SSH	National Grid (Observer)
Scott Laczay	SL	Ofgem (presenter)
John Twomey	JT	Code Administrator (presenter)

1 Introductions and Apologies for Absence

TM commenced February's Panel meeting with round table introductions and acknowledged the role of all non-Panel members present. Advance apologies noted for Steve Cox with no alternate present.

All Panel papers (PP) and presentations (Pr) referred to at this Grid Code Review Panel meeting can be found in the Grid Code Panel area on the National Grid website:

https://www.nationalgrid.com/uk/electricity/codes/grid-code/meetings/grid-code-panelmeeting-22022018

2 Approval of January minutes

1380. January minutes were reviewed and approved.

ACTION 81 Lessons Learnt

1381. CB re-iterated that a review of the 'lessons learnt' piece of work would be returning to the March Panel.

ACTION 66 SOGL Articles

1382. This is an ongoing action to be addressed from the Grid Code Development Forum (GCDF). RW noted that subject to AF's agreement, the <u>slides</u> presented at February's GCDF will be amended to address the remaining points. AF pointed out that NGET has now stated that Table 1 Annex V (as referred to in SOGL Article 154.1) is relevant to FCR with an entry into force date of mid-September 2018. He noted that there are technical requirements which now apply and there is a need for a process for users who do not comply. RW highlighted that it is not the intention to cause difficulty or put any user through additional qualification routes but that this will be addressed as part of the update. This action is to remain open in the meantime.

4 New modifications

1383. RW was invited to present the Modification Proposal for GC0108:

https://www.nationalgrid.com/sites/default/files/documents/PP3.GC0108%20EU %20Code%20Emergency%20and%20Restoration%20Black%20Start%20testin g%20requirement.pdf

- 1384. AF stated he had two immediate comments. The first comment was that, in principle, the proposal appears to be fairly straight forward and immaterial but the legal text suggests otherwise. He stated that the legal text suggests a material impact (specifically the cost to generators and the requirement for station test versus the requirement for unit test) and that this conflicts with the text in the proposal. AF highlighted that it is not the immaterial bit that is being modified. Secondly, and similarly to the ongoing SOGL comments, AF questions where the rest of the Emergency and Restoration Code is being covered. GV agreed with this preference for a code mapping exercise and was told it was being reviewed under JESG. KB clarified that the mapping exercise for Emergency & Restoration Code was carried out under the JESG.
- 1385. GG was invited to comment and as a member of Black Start Task Group accepted AF's point, confirming his fundamental concern with the legal text for black start testing. The commercial impact was highlighted. GG also commented that, like the SOGL, the Emergency and Restoration Code is a code that is applicable to everyone, new and existing.
- 1386. RW acknowledged issues with how the legal text is articulated. AC questioned why a different approach to the code mapping process has been taken to the one adopted for RfG, and although all relevant stakeholders can attend JESG questioned whether they do attend and whether there is a DCRP representative. AC noted his concern that if a single group is doing the mapping and not all relevant parties are represented then how confident can

the Panel be that all elements of interest to the Panel are being appropriately addressed. RfG involved a joint Workgroup which does not appear to be the case here.

1387. GG as Chair of Electricity Task Group flagged issues around E&R. He encouraged National Grid to engage with stakeholders in the drafting of key documents such as the System Defence Plan and System Restoration Plan.

Action 91: RW to return to March Panel meeting with revised proposal which addresses all issues raised, an update on the mapping process, and circulate to GCRP

1388. GG was invited to present the Modification Proposal for GC0109 and talked through the presentation material circulated online:

https://www.nationalgrid.com/uk/electricity/codes/grid-code/meetings/grid-codepanel-meeting-22022018

- 1389. In order to ensure that work is not duplicated, GV wished to understand any current mechanisms which may already be publishing system warnings and alerts. GG acknowledged that where a mechanism is known to exist then there is no intention to include in the solution.
- 1390. KB queried the feasibility of such processes being implemented by October 2018 especially in the event of additional costs being incurred by the network operator and when the extent of the information already being communicated was not yet known. She also noted that there is also a need to understand whether there is sensitive data that cannot be shared.
- 1391. GG stated that he is not looking for whole new system. GG explained that there are already internal electronic communications by network operators but not all of these communications are available to market participants. He noted that this is a request for those communications to be shared/extended via text messages and/or via email distribution lists to those who wish to receive this information.
- 1392. AC put forward the suggestion that the ENCC Control Room should be represented at the Workgroup in order to understand all current mechanisms and communication processes.
- 1393. The Terms of Reference and the scope of the modification was discussed and agreed as follows: i) understand legal requirements as set down by EU legislation to ensure legal requirements are delivered according to timelines ii) supporting document to form part of ToR iii) how does someone get added to the distribution list and/or is there a current process for being added to the list iv) look at existing systems and processes and determine whether they are adequate v) consider how Grid Code should be amended to place the obligations on the appropriate party, and vi) understand any IDNO implications
- 1394. DJ commented that this piece of work fits well with Road Map issued by SO and the interaction with future Distribution System Operators (DSOs). This data

transfer between SO and DSOs should be a priority whether this modification proceeds or not.

1395. The Panel discussed compliance, recognising the current requirements in the Grid Code for system warnings.

5 Workgroup Reports

GC0099 Establishing a Common Approach to Interconnector Scheduling

- 1396. CB referred to the GC0099 Workgroup Report and asked for comment on whether the Workgroup had met its Terms of Reference in order for the Code Administrator Consultation to be issued. GN made some minor editorial observations (referencing the summary section, accuracy of the membership list, clarification over users represented, etc).
- 1397. Panel members otherwise agreed that the Workgroup has met its Terms of Reference. The Code Administrator will now revise the document to reflect Panel feedback (as above) and issue for Code Administrator Consultation.

6 Authority Decision

GC0098 Using GB Grid Code data to construct the EU Common Grid Model in accordance with Regulation EU 2015 1222 CACM and Regulation EU 2016 1719 FCA

1398. CB noted the Authority decision on this modification which can be found at the following link: https://www.nationalgrid.com/uk/electricity/codes/grid-code/modifications/gc0098-using-gb-grid-code-data-construct-eu-common. The Authority requested, within their letter, for the legal text to be revised. CB put forward a new timetable for this modification which was approved by the Panel. This timetable consists of the legal text being presented at GCDF for discussion with Industry and then presented back to the GCRP in April before a further Code Administrator Consultation and further Determination Vote are carried out.

7 Modification updates

1399. CB used the presentation slides circulated online to provide an update against each inflight modification:

https://www.nationalgrid.com/sites/default/files/documents/Pr3.%20GCRP%20CA%20 Modification%20Progress%20Slides.pdf

GC0096 Energy Storage

1400. GN reflected on how this modification has evolved since it was raised in August 2016. He noted that it was originally raised to understand what to do with Connection Offers but given that National Grid already makes

offers/agreements with storage there is clearly not an issue. RW stated that National Grid is legally obligated to issue connection offers to any provider within 3 months but that for storage projects there was no way of ensuring that the technical conditions in such an offer were consistent. This modification has sought to provide that consistency.

1401. A new timetable was presented to the Panel. The timetable accommodates the decision made at the last Panel meeting on RfG (modifications GC0100-102) as the new baseline text, it was noted that the decision from the Authority is expected mid-March. This timetable was noted by the Panel and a decision was made to discuss this further under the prioritisation section of the agenda.

GC0097 Project TERRE

1402. It was noted that this modification is on track against the current timetable, that the Workgroup Consultation was issued and that there were fourteen responses with further meetings planned every two weeks with the Workgroup to conclude their work.

GC0103 The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes

1405. CB noted that the next meeting on GC0103 was due to be scheduled for late March 2018. She explained that the Transmission Owners had completed their review of the impact of the proposed solution from the GC0103 Proposer. CB asked the Panel whether, following seeking a Technical Chair whether the action could be closed. She noted that the Code Administrator had not been able to source one to date. The Panel requested that the Code Administrator seeks to find a suitable Technical Chair this once more before closing the action.

GC0104 EU Connection Codes GB Implementation – Demand Connection Code

1406. CB explained to the Panel that this modification was currently working towards issuing their Workgroup Consultation but that there had been some concerns raised by Workgroup members around it being issued without some further development. CB stated that she would be working with the Workgroup on these developments and hopes to issue the Workgroup Consultation in the next couple of weeks. She noted the risk to the current approved timeline which outlines the Workgroup Report being presented to the Panel in April 2018.

GC0105 System Incidents Reporting

1407. CB confirmed that the first Workgroup was to take place immediately after the Panel meeting. She additionally noted that the Terms of Reference had been approved by the Panel. A further update on Workgroup progress is to be given at the March Panel meeting.

GC0106 Data exchange requirements in accordance with Regulation (EU)

1408. CB highlighted this modification as a priority modification due to EU compliance. The work was currently cited as being on track.

GC0107 The open, transparent, non-discriminatory and timely publication of the generic and/ or Power Generating Module specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the RfG.

1409. The Code Administrator updated that this modification needs to be prioritised with GC0096, GC0103, and GC0105 and that no Workgroup meetings had taken place since December 2017.

8 **Prioritisation/Horizon Scanning**

- 1410. JT introduced himself as having overall accountability for the Code Governance Team within National Grid. He noted that similar discussions to this are taking place with the CUSC Panel and it is now moving into the Grid Code arena, stating that this will be a principle based conversation to seek feedback from the Panel on the best approach moving forwards.
- 1411. JT introduced the 4 key prioritisation principles as those adapted from CUSC:

https://www.nationalgrid.com/sites/default/files/documents/Pr4.%20Prioritisation .pdf

- 1412. TM highlighted that this type of conversation helps to provide transparency around the work of the Panels and what they are accountable for.
- 1413. In response to questions regarding how the Code Governance function is funded, JT stated that funding is currently linked to RIIO T1 funding and confirmed that there is an annual budget for the team. He noted that National Grid is not similar to other Code Administrators and the annual funding discussions that they may have.
- 1414. On reviewing the 'consumer impact' criteria, some Panel members agreed that this was difficult to measure and that the way this is assessed could become very subjective. Panel members recognised themselves as experts on the Applicable Objectives rather than on less tangible outputs such as consumer impact. The Panel were asked to consider Ofgem's wider statutory duties beyond the applicable objectives and increasingly towards consumer impact.
- 1415. KB acknowledged that the request was around how to prioritise rather than to commit or formalise anything in the Grid Code itself. AC highlighted one of the drivers behind Open Governance was to positively affect the amount of time being taken to process change and Panel need to ensure that modification proposals are considered in a timely manner.

GG noted that, from a Stakeholder perspective, and as a Proposer, he would want to see where his modification sat within the prioritised list and understand what would happen in the event that a further higher 'priority' modification were to be raised. The Panel discussed this and agreed that it would be of benefit to note where modifications may be pushed back, how many times they had been pushed back and whether there should be a maximum deferral time. JT stated that these conversations would have to continue, be honest, clear and have an audit trail for transparency.

The Panel agreed the criteria that had been proposed. The Code Administrator took an action to produce a first attempt and prioritising the modifications against the criteria agreed. The Panel also took an action to review the current modifications and come prepared to the March Panel to discuss how the modifications should be prioritised.

ACTION 92: Code Administrator to circulate to Panel members a 'strawman' of all inflight modifications

ACTION 93: Panel members to review all inflight modifications and to prioritise according to principles for discussion in March Panel meeting

9 Draft Final Modification Reports

1416. It was noted that there were no draft Final Modification Reports for discussion at this Panel meeting.

10 Electrical Standards

1417. Further to last month's update, CB presented the Governance process for Electrical Standard review and sign off:

https://www.nationalgrid.com/sites/default/files/documents/Pr5.%20RES%20Go vernance.pdf

- 1418. Panel members raised concerns with the current process as one which does not facilitate transparency or offer a secure audit trail. There was an acknowledgement that the RES changes should just follow the processes as outlined in the Grid Code and that the Grid Code Development Forum could be used to review any issues.
- 1419. Panel members discussed the process in the event of an objection and that comments produced could constitute as an objection to the amendment being proposed by National Grid. The Panel agreed that there should be a new 'Cover note' produced by the Code Administrator outlining the bullets covered in the slide presentation produced. It was agreed that this would aid with the audit trail of the proposed amendments.
- 1420. The Panel also agreed that following comments being provided by Panel members and being taken on board/rejected that there should be a further twenty working day period that would be outlined on the cover note produced. If there was then an objection at this stage then the proposed amendment would be tabled at the next Grid Code Panel meeting.

11 Governance

1421. ND reflected on the process and the outcome of the Recommendation Vote for GC0100/GC0101/GC0102 and invited any comment/feedback. This would form part of improvement activities going forward. The voting template used was endorsed by GG (a CUSC Panel member) who stated that it is routinely used on CUSC and to good effect. It was noted that the Recommendation Vote is carried out formally in person, rather than by email correspondence due to market information that Panel members may receive ahead of the vote taking place meaning that should members vote on different days this could be an advantage or disadvantage and that all members should have the same information at the same point in time. The Code Administrator stated that they would continue to use the voting templates to assist in speeding up the process in terms of efficiency. It was also noted that the pre population of this template did not mean that amendments could not be made by Panel members on the day of the vote.

In terms of lessons learnt, the Chair reflected that:

- Everyone should come to the meeting ready to vote
- Alternates should ensure they are fully briefed and up to speed
- The discussion should focus on the voting recommendation. Any enquiries or points of clarification on the content of the proposed mods should be raised in the workgroup or consultation stages, or brought to the attention of the Code Administrator in advance of the meeting.

12 Grid Code Development Forum (GCDF) and Workgroup Day

- 1422. CB informed the Panel that there are items for GCDF on Emergency Disconnection, FFCI and LMFS-O for Type B Generators.
- 1423. The agenda for Workgroup day, however, is not as defined. Panel members were invited to prioritise Workgroups for this day but no firm decision was made.

13 Reports to the Authority

1424. CB noted that GC0100-GC0102 had been submitted to the Authority as Final Modification Reports and a decision was expected mid to late March 2018.

14 Standing items

1425. The <u>Codes Summary</u> and <u>JESG Update</u> were noted and no further comments were made on these.

15 Impact of other Code Modifications or Developments

SQSS

1426. The Panel requested an overview of GSR016 as one which is likely to impact the Grid Code.

ACTION 94: Code Administrator to facilitate this presentation for March GCRP

16 AOB

- 1427. Ofgem attended to present on the Electricity Sandbox. The presentation can be found in the Panel presentations. GG noted that he had provided Ofgem with some questions through the CUSC Panel and that it would be useful for the Grid Code Panel to have sight of these. The Code Administrator agreed tto circulate these to the Panel.
- 1428. GN noted GC0036 and the consequential modification to the Grid Code following the completion of the work under the Distribution Code needed to be captured in the horizon scanning work.

ACTION 95: CA to circulate GG Sandbox legal questions to Panel members

ACTION 96: CA to add GC0036 consequential modification to horizon scanning document

17 Next meeting

The next Grid Code Panel meeting is taking place on **Thursday 22 March 2018**. Location TBC.