

Minutes

Meeting name Grid Code Review Panel

Meeting number 15

Date of meeting Thursday 26 April 2018

Location National Grid House, Warwick

Attendees		
Name	Initials	Role
Trisha McAuley	TM	Chair
Chrissie Brown	CB	Code Administrator
Naomi Davies	ND	Code Administrator
Gurpal Singh	GS	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
Damian Jackman	DJ	Panel member
Nick Rubin	NR	BSC Panel Member
Guy Nicholson	GN	Panel member
Rob Wilson	RW	NGET (Alternate)
John Martin	JM	Presenter for GC0112
Mike Kay	MK	Presenter for GC0110/GC0111
Garth Graham	GG	Presenter for GC0113
Shazia Akthar	SA	Code Administrator (Observer)
Scott Laczay	SL	Presenter – Ofgem Innovation Team

1 Introductions

TM commenced the Panel meeting with round table introductions and acknowledged advance apologies as received from Robert Longden and Kyla Berry noting alternatives where present. Shazia Akhtar was introduced as an observer from the Code Administrator team.

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-panel-meeting-26042018

2 Approval of March Panel minutes

1508. The March Panel meeting minutes were reviewed and comments submitted by AC and AF were discussed and agreed. Duplication paragraphs at 1455 and 1457 were acknowledged and are to be removed.

1509. GN highlighted minute reference 1466 and requested that this double definition issue around 'BS' be recorded for future housekeeping. AC stated that on further review of GC0108, the definitions do not work and will need to be considered further, which may address GN's concern.

ACTION 104: Code Administrator to record double definition issue to be addressed through a future housekeeping modification

3 Actions Log

ACTION 100 (GC0108)

1510. The action was clarified and the Code Administrator is to now seek and circulate the dates for the mapping exercises planned in relation to SOGL and Emergency and Restoration. It was confirmed that these will be circulated via the Grid Code Newsletter to ensure wider industry participation in the exercise.

ACTION 66

1511. Following conversations with AF, RW confirmed that NGET would be discussing the modification proposal to address the Pre-qualification Processes required by SOGL at the next Grid Code Development Forum (GCDF) on 2 May 2018. Panel again recognised that SOGL requires FCR, FRR, RR, etc. pre-qualification requirements to be published by September 2018. AF was reassured by this forward work plan. This action can now be closed pending the forthcoming modification proposal.

ACTION 102

1512. NR confirmed that in the absence of any alternative nomination he would be a Workgroup member for GC0109. This action can now be closed.

4 Prioritisation

- 1513. ND summarised last month's Panel discussions (see March minutes) recognising the value added in developing the criteria to date but also adding that a small cross code working group had subsequently and informally been established comprising CUSC and Grid Code Panel members to agree some common principles. These newly suggested Prioritisation principles (complexity, importance and urgency as extracted from Governance Rule 19.1(e)) were discussed and developed further as follows below.
- 1514. NR commented that the approach appeared to be more streamlined, aligned and less confusing than an assessment against the five criteria previously discussed. Panel agreed with this, recognising the intention of the principles to enable open and transparent decision-making in respect of how defects in the Grid Code are prioritised. Panel agreed them as guiding principles and ones which are not intended to provide any level of granularity.

1515. 'Complexity' was discussed with the suggestion that resource implications should be secondary to the cross-code implications of the modification and the impact on the wider energy industry. An action was agreed to include the cross-code impact/timelines into the prioritisation stack/Plan on a Page. NR commended the Code Administrator for the visible representation provided at the meeting.

ACTION 105: Code Administrator to incorporate cross code impact through added references or timelines in the developing Plan on a Page

- 1516. Innovation, the developing energy market/system, technical complexity and the potential implications on multiple Grid Code parties rather than just citing the cross-code implications was also discussed under 'complexity'. It was agreed that 'Market' should be replaced with 'system'. GS recognised the value in defining complexity in generic terms so it can be applied across the codes.
- 1517. AC reflected on 'urgency' as a factor on its own in determining priority and that the reference to 'complexity' and 'importance' should be removed from the urgency criteria description. NH emphasised the distinction with the Ofgem urgency criteria as defined in the Grid Code.

ACTION 106: Code Administrator to re-articulate the complexity and urgency guidance to reflect Panel discussions and share with working group

1518. Towards the end of the discussions, NR asked questions around understanding and then communicating outwards the practical effect of having these discussions and prioritising the modifications. The Panel and the Code Administrator took an action to reflect on this and develop the appropriate communications.

ACTION 107: Panel members and the Code Administrator to understand industry requirements and practical expectations from these discussions

5 New Modifications

GC0110: Limited Frequency Sensitive Mode – Overfrequency (LFSM-O) Compliance requirements for Type A and B Power Generating Modules (PGMs)

GC0111: Fast Fault Current Injection (FFCI)

- 1519. MK introduced modification proposals GC0110 and GC0111 on behalf of absent Proposers Chris Marsland and Steve Cox respectively and did so by talking through the slide material as presented in Pr2 and Pr3. This material was circulated to Panel members and published online ahead of the meeting.
- 1520. Proposals were supported by RW in the first instance as adding clarification of in part existing Grid Code requirements but also in relation to RfG implementation but being more than a minimum solution for this work. Questions were asked in relation to wider engagement beyond synchronous generators/manufacturer. MK confirmed that discussions were currently confined to synchronous machine manufacturers but that wider engagement would form part of the Workgroup objectives.

- 1521. DJ confirmed that he had no issue with the proposals albeit raised the point that the work was contingent on GC0100-GC0102 being implemented. CB confirmed that a decision from the Authority as well as implementation was anticipated before the commencement of the Workgroup proceedings and was not a reason not to progress the work given the nature of the defect identified.
- 1522. Panel members discussed the type of generator GC0111 refers to (Type B to D) and the fact that, although there is a requirement on Type Ds, it will apply to Type B and Type C generators. RW agreed that the proposal would add the necessary clarify following some non-intentional and accidental drafting in the legal text supporting RfG implementation.
- 1523. A discrepancy in the wording of GC0110 and the high impact for Type As is to be corrected to reflect what is in the summary section, namely that this modification should apply to Type A and B PGMs only.

ACTION 108: Code Administrator to support the GC0110 Proposer to revise the Modification Proposal and re-submit to the Code Administrator for uploading to the website

- 1524. The proposed Self-Governance route was evaluated by Panel against the criteria. CB referred the Panel to the Materiality Guidance on the website highlighting its relevance to all users and that any currently unknown or unresolved materiality issues can be referred back to the Panel by the Workgroup. Additionally, Panel were reminded that Ofgem can reverse any Self-Governance determination based on how work is progressing and direct the Proposal to proceed through the Standard Modifications process. A comment was made that both positive and negative material impact should be considered.
- 1525. MK confirmed the overall intent of the modifications to be to provide clarification on the requirements brought in by RfG and therefore avoid costs for manufacturers.
- 1526. Panel decided to proceed via the Self-Governance route on the basis that there is no known material effect, noting the recourse back to Panel should issues arise. 'Material effect' will be a subtitle in the Workgroup Report to capture the Workgroups thoughts on the maternity of the proposal. Panel agreed to form a Workgroup to develop the proposed modification.
- 1527. Panel agreed for the Workgroup to consider the need for a Workgroup Consultation but to recognise that for materiality to be fully considered it will be incumbent on Workgroup to invite comment from industry.

ACTION 109: Code Administrator on behalf of the Panel to submit a Self-Governance Statement to the Authority

ACTION 110: Code Administrator to complete Terms of Reference to include considerations re material impact and wider Workgroup membership

GC0112: National Grid Legal Separation Grid Code changes to incorporate NGESO

- 1528. JM introduced modification proposal GC0112 (PP5) and did so by talking through the slide material as presented in Pr4 and as circulated ahead of the Panel meeting.
- 1529. AC commented on the large number of code changes and the brevity of the paper, explaining that some guiding principles would be useful for Panel and wider industry to fully assess and understand. JM highlighted the intention to provide, in the Workgroup report, a high-level view of the ESO and ETO Accountability to industry so participants can understand the scope of the different roles.
- 1530. GV highlighted an expectation that there would have been a more in-depth review into the impact of the changes on the TO's in addition to the 'Transmission Owner' definition to be applied across the relevant sections of the Grid Code rather than just an indication of sections where name changes would apply. Planning Code was specifically referenced. GV agreed to highlight the sections and feedback to JM. JM welcomed the feedback and stressed the intention to have consistency of approach in how parties/users are treated through the Code.
- 1531. AQ acknowledged that transmission owners (onshore, offshore, etc.) are referenced in several different ways throughout the Grid Code. Feedback around how to ensure consistent application of the definitions was welcomed. AQ stated that feedback received so far indicated a preference for minimum change rather than more change. GN highlighted the opportunity this work presented for a proper review.
- 1532. NR raised a point of clarity around the reference made in the proposal to a non-published appendix or one that was not circulated in the Grid Code Panel papers.
- 1533. AC wished to understand which industry groups and parties (names of groups / parties represented and numbers, etc.) other than National Grid had been involved in the page turning exercise to understand the totality and the impact of the changes. JM highlighted the early engagement strategy that had taken place whilst recognising the limited response from industry.
- 1534. The proposed governance route was discussed with concerns raised around the process being proposed including the suggested use of a webinar (in lieu of a Workgroup) to agree the legal text before the Code Administrator Consultation. JM clarified this preference as one which would make better use of industry time ie. by not forming a Workgroup for the sole purpose of reviewing legal text hence the webinar approach and the invite for industry comment to refine the legal text ahead of proceeding to wider Consultation.
- 1535. NR raised the issue of cross code impact and visibility of this. JM confirmed that there was an impact on other codes but the modifications were being raised in order of complexity. There is one definition to change in the BSC for example and this modification will be raised in June. Changes to the Grid Code are more

- complex. JM updated the Panel re the governance route agreed by the STC Panel (straight to Code Administrator Consultation).
- 1536. Panel agreed to form a Workgroup to assess and develop the proposal and for a Workgroup Consultation to be issued along the normal governance route. The Terms of Reference were discussed to include a review of the legal text, a summary of changes to the other codes to better understand the broader effect of the changes and the wider impact of the changes. Panel agreed that only one Workgroup is anticipated for the work to be concluded ahead of Consultation.
- 1537. GS questioned why this modification could not proceed through Self-Governance. JM highlighted the assumed material effect the changes would have in addition to the licence changes on which the Authority would be required to make a decision.

ACTION 111: GC0112 Proposer to incorporate Panel views into the report including the cross-code impact of the changes and to work with the Code Administrator to facilitate industry engagement

GC0113: The open, transparent, non-discriminatory and timely publication of the generic and/ user specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the Demand Connection Code (DCC).

- 1538. GG introduced modification proposal GC0113 (PP6) and led the Panel through the slide material as presented in Pr5 and as circulated ahead of the Panel meeting.
- 1539. AC requested examples of technical requirements in the Demand Connection Code (DCC) that could be covered by this modification and RW stated it would be useful to know which set of values are being requested and whether these are just the values that will be set through national implementation of DCC in GC0104. GG confirmed that the proposal is not looking to set the values, rather how the values are published in a consistent way as per the requirement in the DCC and that somewhere between 0 and 100% of the values could indeed be set by GC0104.
- 1540. AF questioned the August date in the GC0113 proposal. GG confirmed that the date would be checked and revised accordingly, stating that it is likely to be amended to a date in December.
- 1541. Panel agreed with the proposed governance route (see slides) and formed a Workgroup on this basis. They also agreed to amalgamate the proposal with GC0107 as per Governance Rule 19.3. GG, as proposer of both GC0113 and GC0107, agreed to this amalgamation.

6 Workgroup Reports

GC0097 TERRE

1542. ND presented the GC0097 Workgroup Report to Panel for review ahead of issuing for wider consultation. Presentation material can be accessed here. Panel agreed that the Workgroup had met its Terms of Reference.

ACTION 112: Code Administrator to ensure timely Code Administrator Consultation and FMR submission is co-ordinated with P344

7 Authority Decision

GC0100/GC0101/GC0102

1543. GS confirmed Authority decisions for GC0100/GC0101/GC0102 are still going through the review process and the decision is due late next week (w/e 4 May).

8 Current Modification Updates

1544. CB used the presentation slides circulated online to provide an update against each inflight modification. The presentation material can be accessed via Pr7. On review of the updates, Panel agreed the priority of each modification against the agreed principles.

Requirements for Generators (RfG) Implementation

1545. The National Grid Representative highlighted a possible need for a future housekeeping modification to recognise potential interpretation issues around RfG implementation dates. This would be a small correction to provide clarity for parties caught by the connection codes.

GC0096 Energy Storage

1546. The priority of GC0096 was discussed based on its implications for a growing number of users and the length of time that this has been ongoing. The Code Administrator confirmed that the revised prioritisation stack would be published to reflect any revised timelines and to provide additional visibility.

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

1547. Panel were asked to consider the revised report (presented as <u>PP8</u>) for the second Code Administrator Consultation to be issued. Panel suggested some minor amendments to the layout of the legal text and updates to section 4.1 ahead of issuing. Code Administrator to action these amendments ahead of issuing the Consultation.

9 Draft Final Modification Reports

GC0099: Establishing a common approach to interconnector scheduling consistent with the single intraday market coupling processes set out within Regulation EU 2015 1222 CACM

- 1548. CB referred to the draft Final Modification Report as circulated and published online on 18 April 2018. The report (PP9) can be found here. Pr8 was then presented to Panel ahead of the Recommendation Vote.
- 1549. Panel voted with the majority agreeing that WACM2 was the best option. RW noted that this would have implications for further operational costs. Panel were informed that the Final Modification Report inclusive of Panel voting would be circulated post Panel meeting and ahead of final submission to the Authority.
- 1550. Some general comments were made by Panel members which explored how the Panel could be further supported in understanding the technical detail and implications of complex modification reports when submitted to Panel. Code Administrator to facilitate this request where appropriate.

10 Electrical Standards

1551.CB updated Panel confirming that the original package of RES documents had now been signed off. The EU package which comprises standards required for EU compliance attracted comments from DJ during the second round which are now being addressed by National Grid.

ACTION 113: DJ to respond to the Code Administrator email sent on 24 April by COP 27 April

1552. RW confirmed the intention to modify the General Conditions to reflect these latest approved changes.

11 Governance

1548. No issues of governance were raised.

12 Grid Code Development Forum (GCDF) and Workgroup Day

1549. Panel were advised that the SOGL Pre-qualification Processes would be tabled for discussion at the May GCDF ahead of it being formally raised as a modification at the May Panel. A GC0106 Workgroup would convene after the GCDF to discuss the Workgroup Consultation responses.

13 Reports to the Authrity

GC0099: Establishing a common approach to interconnector scheduling consistent with the single intraday market coupling processes set out within Regulation EU 2015 1222 CACM

1550. See Section 9.

GC0104 EU Connection Codes GB Implementation – Demand Connection Code

1551. Final Modification Report still on track for submission to the Authority by the end of June for September implementation.

14 Standing Items

1552. The Codes Summary and JESG Updates were noted as circulated online. No further comments were made on these.

15 Impact of other Code Modifications or Developments

1553. None discussed

16 AOB

1554. SL presented the draft Innovation CACoP Principle (<u>Pr9</u> refers). Code Administrator to circulate the additional guidance material following the meeting and Panel to feedback any comments either to the Code Administrator or directly to Ofgem by 11 May 2018.

ACTION 114: Panel to submit any comment regarding the proposed CACoP Principle either directly to SL or to the Code Administrator for submission to Ofgem

- 1555. GN sought clarification on the content of Ofgem's derogation presentation due for Panel in May or June. A view of the future landscape in light of all the derogations from the Grid Code has led to legacy issues which impact on system integrity that need to be understood so it is not just a process.
- 1556. Special June Panel date confirmed for 14 June. Due to non-availability of TM, John Twomey from National Grid will be chairing this Panel meeting.

17 Next Meeting

1506. The next Panel meeting will convene on **16 May 2018** at National Grid House, Warwick. Webex will be made available.