

Stage 01: Modification Proposal

Grid Code

GC0119:

Mod Title: Post Open Governance Implementation Housekeeping and Electoral Changes

Purpose of Modification: This Modification has been raised as housekeeping Modification for the purpose of correcting minor typographical errors implemented by GC0086.

The Proposer recommends that this modification should be:

- subject to Self-Governance Fast Track

This modification was raised 10 July 2018 and will be presented by the Proposer to the Panel on 18 July 2018. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact:

None



Medium Impact:

None



Low Impact:

National Grid

What stage is this document at?

01	Modification Proposal
02	Workgroup Report
03	Code Admin Consultation
04	Draft Final Modification Report
05	Report to the Authority

Contents

1	Summary.....	3
2	Governance	4
3	Why Change?	5
4	Solution.....	6
5	Impacts and Other Considerations.....	7
6	Implementation.....	8
7	Legal Text	9
8	Recommendations.....	10

Timetable

The Code Administrator will update the timetable.

The Code Administrator recommends the following Self-Governance Fast Track timetable:

Code Administrator Fast-Track Report issued to Panel	18/07/2018
Appeals window open (15 working days)	18/07/2018
Appeals window closes	08/08/2018
Decision implemented in the Grid Code	09/08/2018



Any Questions?

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Proposer:

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1 Summary

What?

Upon approval and implementation of GC0086 – Open Governance, Ofgem have given instruction for a housekeeping Modification to be raised in order to address minor typographical errors and to ensure clarity.

The typographical errors currently impact several Grid Code Processes, and need to be amended due to their impact on the way the code is applied. There are currently six such typographical changes which this modification looks to implement, which are further detailed in Section 07 of this modification proposal and the associated legal text.

Why?

This change is required to ensure the Grid Code Governance Rules are correct and consistent.

How?

The Grid Code Governance Rules should be updated to ensure it is consistent and factually correct throughout.

2 Governance

Justification for Self-Governance Procedures

Self-Governance - The modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- i) Existing or future electricity customers;
- ii) Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,
- iii) The operation of the National Electricity Transmission System
- iv) Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies
- v) The Grid Code's governance procedures or the Grid Code's modification procedures

Justification for Fast Track Procedures

Fast Track Criteria means that a proposal, if implemented:

- a) would meet the Self-Governance Criteria; and
- b) is properly a housekeeping modification required as a result of some error or factual change, including but not limited to:
 - i. Updating names or addresses listed in the Grid Code
 - ii. Correcting any minor typographical errors;
 - iii. Correcting formatting and consistency errors, such as paragraph numbering; or
 - iv. Updating out of date references to other documents or paragraphs.

Requested Next Steps

This Modification should:

- be subject to Self-Governance Fast Track

3 Why Change?

Upon approval and implementation of GC0086 – Open Governance Ofgem have given instruction for a housekeeping Modification to be raised to address minor typographical errors and provide clarity.

Currently the Grid Code makes incorrect references throughout the Governance Rules and this has the potential to cause misinterpretation of the text. It is important that the Governance Rules are construed correctly and concisely for both User's and the Code Administrator to abide by them.

4 Solution

The Grid Code Governance Rules should be updated to ensure it is consistent and factually correct throughout by making the following changes:

The Grid Code Governance Rules should be updated to ensure a consistent process is followed by making the following changes:

1. To clarify that the Panel cannot reject a Modification raised by the Authority.
2. To clarify the legal text of the withdrawal process for Ofgem raised SCR Modifications.
3. Clarification that Ofgem can attend Workgroups.
4. Remove a redundant reference to *o the election of Alternates*.

5 Impacts and Other Considerations

No major impact or other considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No

Consumer Impacts

No

6 Implementation

The Grid Code should be modified as soon as possible to meet the request made by Ofgem following the implementation of GC0086 – Open Governance.

7 Legal Text

GR.15.6 Without prejudice to the development of a **Workgroup Alternative Grid Code Modification(s)** pursuant to GR.20.10 and GR.20.15, the **Grid Code Review Panel** shall direct in the case of (a), and may direct in the case of (b), the **Panel Secretary** to reject a proposal pursuant to GR.15, other than a proposal submitted by **NGET** pursuant to a direction issued by the **Authority** following a **Significant Code Review** in accordance with GR.16.4, or an Authority led modification, if and to the extent that such proposal has, in the opinion of the **Grid Code Review Panel**, substantially the same effect as:

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GR.15.6 Prevents the Panel refusing the raising of a mod by NGET at the Authority's direction, but should also include Authority-raised mods.

GR.16.4 c) it is raised by the **Authority** pursuant to GR.15.1(c)(iii), who reasonably considers the **Grid Code Modification Proposal** to be necessary to comply with or implement the **Electricity Regulation** and/or any relevant legally binding decisions of the European Commission and/or the **Agency**; or

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GR.16.4(c) refers to GR.15.1(c)(i) in relation to code mods required by EU law but GR.15.1(c)(i) concerns SCR-derived code mods. It is GR.15.1(c)(iii) that concerns code mods required by EU law so this cross-reference should be amended.

GR.19.1 (a) The **Code Administrator** and the **Grid Code Review Panel** shall together establish a timetable to apply for the **Grid Code Modification Proposal** process. That timetable must comply with any direction(s) issued by the Authority setting and/or amending a timetable in relation to a Grid Code Modification Proposal that is in respect of a Significant Code Review.

Ofgem suggested compliance with an Authority directed timetable should be explicit in the code because it is a requirement contained in the licence (see SLC C14 2A(f)).

GR.20.9 Subject to the provisions of this GR.20.9 and unless otherwise determined by the **Grid Code Review Panel**, the **Workgroup** shall develop and adopt its own internal working procedures for the conduct of its business and shall provide a copy of such procedures to the **Panel Secretary** in respect of each **Grid Code Modification Proposal** for which it is responsible. Meetings of each Workgroup shall be open to attendance by a representative of any User, (including any Authorised Electricity Operator; NGET or a Materially Affected Party), the Citizens Advice, the Citizens Advice Scotland, the Authority and any person invited by the chairman, and the chairman of a Workgroup may invite any such person to speak at such meetings, other than the authority who may speak at any time as per GR20.3.

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GR.20.9 does not explicitly allow for Ofgem to attend Workgroups and so the Authority should be added.

GR.7.2 Alternate(s): other Panel Members.

- (a) At the same time that the parties entitled to vote in the relevant election appoint **Elected Panel Members** under GR.4.2(a), they shall appoint the following **Alternate Members** ~~in accordance with Annex Gr.A~~

The election process at GR.A doesn't refer to the election of Alternates as indicated at GR.7.2.

8. Recommendations

Panel is asked to:

- Agree that Self Governance Fast-Track procedures should apply