

Minutes

Meeting name Grid Code Review Panel

Meeting number 16

Date of meeting Wednesday 16 May 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
Jeremy Caplin	JC	BSC Observer
Guy Nicholson	GN	Panel member
Rob Wilson	RW	NGETOobserver
John Martin	JM	AOB discussion on legal separation
Robert Selbie	RS	GC0114 Proposer

1 Introductions

TM commenced the Panel meeting with round table introductions and acknowledged advance apologies as received from Steve Cox.

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-16052018>

2 Approval of March Panel minutes

1558. The April Panel meeting minutes were approved subject to comments received ahead of the meeting being incorporated from AC.

3 Actions Log**ACTION 6**

1559. ND noted that there was an outstanding action in relation to the action log used pre open governance. She stated that she had carried out some work on the previous log and all remaining actions were with reference to Relevant Electrical Standards and had therefore been addressed. Action to be closed.

ACTION 54

1560. ND noted that there was an ongoing action to source a Technical Chair for GC0103. TM asked the Panel if this was still required due to the time lapsed. The Panel concluded that the Code Administrator should seek the views of Workgroup with regards to the matter and come back to the Grid Code Panel. Action to remain open.

ACTION 66

1561. AF noted that action 66 had been removed from the log rather than moved to the concluded action section. It was agreed this needed to be reinstated and noted as complete.

5 New Modifications

GC0114: System Operation Guideline: Prequalification Processes

1562. RS attended the Grid Code Panel to talk through his Proposal, GC0114. He stated that there was no governance within the System Operation Guideline to state how the Pre-qualification requirements need to be approved.
1563. RL questioned whether it was the case that the EU Regulations outline a number of services and that they would have to be matched with what services are currently provided. RS stated that this was correct and that a mapping exercise would need to be carried out.
1564. AF noted that there would also need to be a separate piece of work carried out for the Balancing Code and the approval of special services.
1565. RS stated that it was likely that the modification would result in a new section being added to the Grid Code. In addition, he noted that input would be required from a cross section of Industry including Distribution Network Operators.
1566. NR stated that this modification was part of a number of modifications to the Grid Code, CUSC and BSC to implement the EU Network Codes and that careful consideration would be required to look at the overlap (if any) with other changes that have or are currently going through the change processes across Industry. He went onto note that it's important that these amendments do not add inconsistency and thought is given to how it is all pieced together.
1567. The Panel discussed the need to have existing providers included and the work that had been completed on GC0097 – TERRE which was due to be submitted to the Authority by the end of June 2018.
1568. RL stated that he would highlight the modification to his contact with smaller generators and recommend their involvement.

Action 115: RL to speak to contacts around GC0114 to recommend attendance at workgroup/being added to the circulation list for updates

1569. AF highlighted the implementation date and what implementation looks like and that it was an important area that needs to be looked at in detail.
1570. GS asked RS what the existing process is. RS stated that there was not something you could 'point to' currently and that it was outlined in a number of places such as service level work and some is described in the Grid Code. GS then asked if this was something that could be specified out of the Grid Code. The Panel highlighted that this modification had been raised to provide transparency based on stakeholder feedback from AF at previous Panel meetings.
1571. GS additionally questioned as to whether this modification would need to be implemented by September 2018. RS stated that the process would need to be outlined by September as per the SOGL requirement but that this could be done based on feedback from the Workgroup for this modification and then the modification could be implemented at a later date.
1572. The Panel agreed that this modification would have a material impact and that it should be submitted to the Authority for a decision. It was noted that there would be an impact on competition due to this modification facilitating a level playing field and that this positive impact would be material.
1573. The Panel agreed to add the following points, based on their discussions, to the Terms of Reference for the Workgroup they requested to set up to address the defect identified:
- a) Consider material impact of modification
 - b) Consider distribution connected parties providing the services
 - c) Ensure fair representation of industry through Workgroup membership to include generation, demand, storage, aggregators, existing and future balancing services providers
 - d) Ensure all requirements from EU Regulations are captured and mapped
 - e) Define the pre-qualification process
 - f) Define the transitional arrangements
 - g) Set the implementation date
 - h) Consider cross code impacts (eg. with GC0097) and how the modification co-exists with other industry codes to ensure consistency with services being developed and implemented
1574. The Panel requested for the Workgroup Report to be presented back to the September 2018 meeting.

6 Workgroup Reports

GC0104 EU Connection Codes GB Implementation – Demand Connection Code

1575. CB presented GC0104, outlining how the Workgroup had met their Terms of Reference and the proposed timeline. The Panel agreed that their Terms of Reference had been met and the Code Administrator Consultation could be issued. It was noted by CB that the Panel Recommendation Vote would be taking place on the 14 June 2018.

7 Authority Decision

1576. GS noted that the Authority had received **GC0099 Establishing a common approach to interconnector scheduling consistent with the single intraday market coupling processes set out within Regulation EU 2015 1222 CACM** and that they would adhere to their twenty-five working day KPI.
1577. GS stated that it would be of benefit for Panel members to add more reasoning behind their voting ahead of submission to them for decision. This was noted by the Code Administrator and Panel for consideration for future modifications being submitted.
1578. GS additionally noted that they had approved the Original modifications for GC0100-102 and that they were due to be implemented on the 16 May 2018. He expressed his apologies for the short implementation timeline of one working day for the Code Administrator to implement these modifications. CB stated that the modifications would be implemented on the 16 May 2018 as requested.

8 Current Modification Updates

1579. CB used the presentation slides (Pr3) to talk through the modification updates for the Panel.
1580. CB noted that the last GC0096 meeting took place in January 2018 and that the Workgroup had been awaiting the implementation of GC0100-102 to use as the baseline text for their Workgroup Consultation. It was stated that this work could now be completed and that a meeting would be set up in July to complete the review ahead of commencing the Workgroup Consultation. The Panel questioned as to whether, due to the amount of time elapsed since the modification was raised (two years) the defect was still relevant and requested a progress update for the next Panel meeting.

ACTION 119: NGET Presentation on GC0096 to be provided at the next Panel meeting.

1581. It was noted that **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) was due to be issued for a second Code Administrator Consultation in the next few days. This would mean that the Self-Governance(Determination) vote for this modification would take place at the 28 June 2018 Panel meeting.
1582. CB explained that there had been no further **GC0103, GC0109, GC0107 and GC0113** meetings since the last Panel meeting.
1583. The Code Administrator stated that the **GC0105** (System Incidents Reporting) Proposer was working on drafting their proposed solution based on feedback from the Workgroup, it was explained that following this the Workgroup would be in a position to consult ahead of submitting their Workgroup Report back to the Panel.
1584. ND updated the Panel by stating that there would be a **GC0106** (Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL))

discussion following the conclusion of the Panel. She explained that three Workgroup Alternative Code Modifications had been raised at the Workgroup by SSE Generation Ltd. The Code Administrator noted that there had been some feedback, informally, from various workgroup members to the extent that working up these alternatives would be a significant amount of work and it was likely that the Workgroup would be seeking advice from the Panel following the meeting on the application of GR20.8.

1585. The Panel requested that more information be sent to them on the alternative proposals and sought any feedback from the Authority at this stage. GS stated that their general guidance would be to facilitate the minimum change necessary.
1586. CB noted that should the Panel want to consult with the Authority with regards to this, a letter would need to be drafted and that due to the compliance deadline it would be beneficial to draft this ahead of the next meeting and circulated should the Workgroup conclude that they would be seeking guidance on GR20.8. The Panel agreed that this should be circulated should the Workgroup be seeking their guidance as per GR20.8.

ACTION 116: Draft letter from GCRP to Authority in reference to GC0106 and GR20.8

9 Draft Final Modification Reports

1587. None.

10 Electrical Standards

1588. None.

11 Governance

1588. No issues of governance were raised.

12 Grid Code Development Forum (GCDF) and Workgroup Day

1589. It was noted that the June Workgroup day would consist of GC0110 and GC0111.

13 Reports to the Authority

1590. The schedule of Final Modification Reports to be issued to the Authority, as outlined on the agenda, was noted by the Panel. This consisted of GC0097 and GC0104 being issued to the Authority on the 25 and 26 June 2018.
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14 Standing Items

1591. The Code Summary and JESG Updates were noted as circulated online. No further comments were made.

15 Impact of other Code Modifications or Developments

1592. No impacts were discussed.

17 AOB

Legal Separation modification approach

1593. JM attended the Panel to talk through an approach to better facilitate the implementation and process to administer the Legal Separation modification and changes required.
1594. JM explained that the current approach, through GC0112 had the potential to cause confusion to Industry in terms of the legal text and which version was being used and when for consultation etc.
1595. JM went onto note that ninety-five percent of the amendments that are being proposed under GC0112 are where the reference is being proposed to be amended from NGET to The Company.
1596. JM therefore proposed that he raise a housekeeping modification to address this. RL stated that this was a pragmatic approach and NR echoed that due to the moving parts of the Grid Code this was the best approach and thanked JM for looking into this. JM stated that he would propose this modification at the next Grid Code Panel meeting and CB noted that the Panel would have to unanimously agree that the modification met the Fast Track Criteria in order for it to be approved as per the Governance Rules.

EU Methodology development and Governance

1597. AF questioned what the Governance Rules were for the various 'Methodologies' associated with the EU Network Codes. He noted that there were some documents that were being half written and consulted on without it being clear as to whether a further consultation would be carried out once the rest of the document was finalised. RS stated that with regards to the specific document that AF had highlighted that a further consultation was due to be carried out but that it should have been more visible. RS highlighted the following Governance procedure:
- The EU network codes are EU regulations that apply directly in GB.
 - The various EU methodologies become essentially extensions of the EU regulation. As EU regulations, they also apply directly.
 - The governance of the development of the EU methodologies is described in the EU network codes themselves. This includes whether or not regulatory approval is required at a national, regional or pan EU level.
 - Stakeholder feedback on the EU methodologies will be collected through the Joint European Stakeholder Forum, and public consultations will be held as required by the EU network codes.
 - There is not a requirement for all EU methodologies to be described in the GB codes, but rather to change those aspects of the GB codes which are not

consistent with the EU network codes and methodologies. This is in line with the 2014 Ofgem letter on Implementing EU Electricity Network Codes and consulting on Ofgem's proposed application process for NEMO designation; *"Ofgem's guiding principles in determining how to ensure compliance with European Regulations is that:*

- *We will only make changes where needed; and*
- *Where changes are needed to implement part of a European Regulation, we will make only those changes necessary to the relevant industry document to ensure compliance with the European codes and guidelines"*

1598. GS stated that the Governance was being looked into and that they would take an action to feed back to the Panel on this and confirm the Governance.

ACTION 118: Authority to confirm governance of EU methodologies in GB

1599. RS highlighted to the Panel that there would be a Webinar taking place which would provide context on the pre-qualification as per GC0114 which was part of a series of communication events that have been scheduled by National Grid and if the Panel hadn't heard about this at this stage they would see communications being issued soon.

1600. NR stated that the Balancing Settlement Group had voiced a concern around the fragmentation on how Industry as a whole is reporting data. He noted that BSC parties were looking into how they publish material but it was also noted that the IS group may be appropriate.

1601. DJ raised a question to KB around the use of windfarms and why they are not being called upon for frequency response. KB requested that the question be emailed to her so she can forward to the appropriate team to respond internally.

ACTION: DJ to email NG representative with question posed in Panel meeting around the use of windfarms

17 Next Meeting

1506. The next Panel meeting will convene on **14 June 2018** via webex for GC0097 and GC0104 Recommendation Votes and **28 June 2018** for the regular Panel meeting.