

Meeting minutes

Grid Code Review Panel

Date:	17/10/2018	Location:	National Grid House, Warwick
Start:	10:00	End:	14:00

Participants

Attendee	Attend/Regrets	Attendee	Attend/Regrets
Trisha McAuley, Chair (TM)	Attend	Jeremy Caplin, BSC Panel Representative (JC)	Attend
Shazia Akhtar, Code Administrator Representative (SA)	Attend	Damian Jackman, Panel Member, Generator Representative (DJ)	Attend
Emma Hart, Technical Secretary (EH)	Attend	Alan Creighton, Panel Member, DNO Representative (AC)	Attend
Robert Wilson, Alternate Panel Member, NGET (RW)	Attend	Gurpal Singh, Authority Representative (GS)	Attend
Guy Nicholson, Panel Member, Generator Representative (GN)	Attend	Nadir Hafeez, Authority Representative – Observer (NH)	Attend
Lisa Waters, Alternative Panel Member, Generator Representative (LW)	Attend	Rachel Hinsley, Code Administration – Observer (RH)	Attend
Graeme Vincent, Panel Member, Onshore Transmission Operator Representative (GV)	Attend	Rachel Woodbridges-Stocks, NGESO – Observer (RWS)	Attend
Francis Dike, NGESO – presenter item 16 (FD)	Attend – item 16 only	John Twomey, NGESO - presenter item 15 (JT)	Attend – item 15 only
Raveena Virk, NGESO – presenter item 16 (RV)	Attend – item 16 only	Shilen Shah, Ofgem – presenter item 17 (SS)	Attend – item 17 only

Discussion and details

1. Introductions and apologies

- 6382 TM opened the Grid Code Review Panel ('the Panel') meeting with introductions and acknowledged the advance apologies received from Robert Longden (RL), Kyla Berry (KB), Alastair Frew (AF) and Sigrid Bolik (SB).

2. Approval of Panel minutes

- 6383 GS queried minute 6310 and Ofgem's ability to take a way this action given their role as decision maker for code modifications.
- 6384 DJ stated that it is difficult to get industry participants to invest into the codes modification process as they do not see an immediate return on spending time on code development. DJ confirmed that he believed that the message needs to come from the Authority and not just from Code Administration as this may influence companies, in particular, larger companies that have the means to invest time and resources, in committing resources to code development.
- 6385 NH again questioned Ofgem's suitability to address this action and considered the Code Administrator to be more suited, referring to National Grid's ongoing Customer Journey work which was looking at this very issue.
- 6386 DJ stated that it would be helpful to the Panel and the Code Administrator if it could look at and point to Ofgem when trying to encourage participation.
- 6387 GS agreed to leave minute 6310 as it is and agreed to talk to the Ofgem stakeholder engagement team as part of action 168.
- 6388 TM raised that AF had suggested that the votes undertaken by Panel should be included in the minutes. The Panel agreed that the votes should be included in the minutes.
- 6389 As Panel Members had raised some points of clarity in the minutes, it was not possible for the Panel to approve them at the meeting. It was agreed that the Code Administrator would respond to the points raised and re-circulate the minutes for Panel approval offline.
- ACTION 177:** Code Administrator to update the September 2018 minutes and circulate for approval via email following the Panel meeting.
- 6390 TM requested that, in future, should Panel members like to clarify any points in relation to Panel meeting minutes, these should be sought at the point of circulation in advance of the Panel meeting to ensure resolution of queries as far as possible ahead of Panel meetings, and for Code Administration to respond to queries in advance of meetings whenever possible in order to ensure sign off during the meeting.

3. Actions log

Action 103

- 6391 GS explained to the Panel that SQSS is a planning standard that specifies how networks should be planned and the SQSS standard is specified in licensee's licences. In addition, there are references to the Price Controls within the licence and therefore any changes made need to be reflected in licensee's licences.
- 6392 GV queried whether there is a better way to update licences (e.g. annually) and sought clarity on which version of the licence licensees should be using – the current version or the one pending changes as there may be cost implications for the licensee.

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- 6393 GS confirmed that the version of the licence to be used will relate to what is in the licence at a particular time and he confirmed that licence changes are a regulatory process.
- 6394 RW queried whether that is an easier way to address this issue and suggested that the SQSS could be an annex to a GB code. However, it was recognised that there is a need to ensure that it captures the right market participants.
- 6395 GS stated that the SQSS is material to price control settlements.
- 6396 TM confirmed that this action is about seeing if more transparency can be given to market participants through the activities of the SQSS Panel. TM requested that the Code Administrator discuss this with the SQSS Panel to see how this process can be made more transparent and accessible to participants.
- ACTION 178:** Code Administrator to discuss with the SQSS Panel ways of making the process more transparent for market participants.
- 6397 The Panel agreed to close action 103.
- Action 125
- 6398 SA confirmed that this action remained open. Further she stated that the letter to Ofgem in relation to GR21.5 would be drafted and circulated to Panel in due course.
- Action 132
- 6399 SA confirmed that the legal text for GC0096 had been circulated to the workgroup ahead of the two-day legal text review scheduled for 24 and 25 October 2018.
- 6400 The Panel agreed this action could be closed.
- Action 136 and Action 162
- 6401 LW confirmed that she had already provided the Code Administrator with comments on the draft Prioritisation document. She queried whether other Code Administrators were using this document or similar?
- 6402 TM stated that following discussions with RL, he is keen to have this document published as soon as possible to provide clarity and transparency to industry. TM confirmed that the CUSC Panel had had an opportunity to provide feedback on the document already.
- 6403 GN stated that there is a need for clarity around what is meant by complexity in the document. He asked whether there was a need to have a scoring system to resolve this?
- 6404 TM stated that the Panel is guided by guiding principles rather than scoring. She requested that the Code Administrator relook at the wording around the term complexity within the document. In addition, TM requested that the Code Administrator consider cross code implications of prioritisation.
- ACTION 179:** Code Administrator to review the wording around 'complexity' in the draft Code Modification Prioritisation Document and consider how prioritisation occurs where there are cross code implications.
- 6405 It was agreed that action 136 could be closed as it has been superseded by action 179.
- Action 142
- 6406 RW confirmed that the action related to Kyla Berry and Ofgem to discuss the governance of EU methodologies.
- 6407 RW provided the Panel with an update on the progress made so far. He confirmed that Greg Heavens has spoken to Ofgem in relation to the EU methodologies and can confirm that the EU methodologies are
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required by the codes and have the same legal status as the codes. Given this, there is no requirement to have these within the codes themselves. However, it was decided in order to make the codes as user friendly as possible, any user facing requirements are being incorporated into the UK codes so that compliance with the UK codes automatically means compliance with the EU methodologies. This also removes any potential conflicts between the codes and the EU methodologies. Where there is a requirement that is not user facing, this is not included within the UK codes.

- 6408 GV raised that the issue raised by AF related to ensuring that market participants are aware of what is happening and therefore this is done transparently.
- 6409 TM queried whether there was a need for something to be circulated to industry. DJ confirmed that he supports something being circulated to industry for clarity.
- 6410 JC queried whether EU requirements should be incorporated into the GB codes.
- 6411 RW clarified that where there are conflicts between EU and GB requirements, this should be updated in the GB codes as directed by Ofgem. However, there should be minimal changes made.
- 6412 LW queried whether Ofgem should write an open letter to stakeholders? She stated that she recalled Ofgem issuing an open letter and therefore queried whether this could be reissued?

ACTION 180: Ofgem and NGET to provide clarity to stakeholders about how the inter-relationships between the EU methodologies and the codes work and the governance structures that were in place to reflect this.

Action 144

- 6413 RW stated that he understood that Garth Graham and Kyla Berry did have a conversation; however, in relation to when and where system warnings had been raised previously, which had led to the need to raise GC0109 to try to make progress on the issue, that no further information had been forthcoming. RW added that this would be really helpful to understand the context, to check that no overlapping work was going on elsewhere, and given the request for urgency and customer complaints received that this did not happen again. RW stated that there was a discussion at a meeting of the E3C group about two years ago which resulted in the production of the spreadsheet of system warnings as used by the proposer of GC0109. However, according to the National Grid representative on this group there was no outstanding action.
- 6414 LW stated that system warnings were discussed at an EnergyUK meeting. LW stated that National Grid said they would consider the system warnings further. However, progress was not reported back to industry and therefore in the absence of this being progressed, a code modification was raised to address the issue raised.
- 6415 RW thanked LW for updating the Panel as he had not been aware of the EnergyUK meeting and asked if it would be possible to get any further information on this such as minutes, actions or who attended.
- 6416 LW stated that in her view it was an easy action to implement the system warnings request. However, what is important now is to get on with it.
- 6417 TM requested that there is some dialogue around how to move this issue forward. The Panel agreed to close this action.

ACTION 181: NGET to discuss with industry how to move the issue of GC109 and system warnings forward.

Action 150

- 6418 SA confirmed that the P28 document had been uploaded onto the website. The Panel agreed to close action 150.

Action 151 and Action 166

6419 SA informed the Panel that we are waiting for dates to be agreed for GC0113/GC0107 workgroup to go ahead. Action to remain open.

Action 158

6420 GS confirmed that the urgency guidance is on the website and that the link in the GC0109 letter took the reader to a separate publication on the Ofgem website.

6421 The Panel agreed to close action 158.

Action 159

6422 The Panel agreed action 159 to be closed.

Action 160

6423 Panel noted that this action relates to action 142 above. The Panel agreed that action 160 should be closed.

Action 161

6424 RW confirmed that once the proposal for G5 goes out to consultation, then a modification in relation to the Grid Code would be raised. Action to remain open.

Action 163

6425 SA confirmed that following the two-day legal text review, the workgroup chair would present a timetable to Panel for review and agreement. Action to remain open.

Action 164

6426 The Panel agreed this action could be closed.

Action 165

6427 SA provided an update to Panel. She confirmed that contact has been made with the transmission operators and that at present the Code Administrator is waiting for responses. Action to remain open.

Action 167

6428 TM provided an update to the Panel about the discussions that the CUSC Panel have had on quoracy (see the update for GC0105 below).

6429 The Panel agreed this action could be closed.

Action 168

6430 This action was discussed in the context of approving the minutes for the September 2018 Panel meeting above. This action will remain open.

Action 169

6431 Panel noted that GC0110 had not been removed from the prioritisation stack and requested that this is done for the November 2018 Panel meeting. Action to remain open.

Action 170

6432 SA confirmed that GC0108 had been sent to the Authority for decision including the requested updates to the draft modification report.

6433 The Panel agreed this action could be closed.

Action 171

6434 SA confirmed that the anticipated decision date of 15 November 2018 and an implementation date of 29 November 2018.

6435 The Panel agreed this this action could be closed.

Action 172

6436 The Panel agreed that this was an ongoing action which should remain open.

6437 AC requested that an update is given to Panel about how the legal separation modifications will be implemented and an update be given to Panel at the next meeting.

ACTION 182: An update to be given to Panel around the implementation of the current and future legal separation modifications.

Action 173

6438 RW agreed to follow up this action and to provide an update to Panel.

Action 174

6439 This action is to remain open.

Action 175

6440 It was agreed that a discussion with AF should be undertaken to move this action forward.

Action 176

6441 The Panel agreed to close this action.

6442 TM expressed a desire for action owners to complete as many actions as possible between meetings. In addition, any clarity required should be resolved prior to Panel meetings to make the best use of time.

3. New modifications

6443 There are no new modifications.

4. Workgroup reports

6444 There are no new workgroup reports.

5. Authority decisions

6445 GS confirmed that the Authority had received GC0108 for decision and the anticipated time line for decision was 15 November 2018.

6. Current modification updates and current Panel priority order

GC0106: Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL)

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- 6446 SA reminded the Panel that they had agreed a one month extension for the workgroup report to be submitted to the Panel by correspondence.
- 6447 SA confirmed that the Code Administrator was currently in discussion with Ofgem about the timelines for both WACM1 and WACM3.
- 6448 RW confirmed that WACM1 and WACM3 are straightforward legal questions but that the drafting of the legal text is complex.
- 6449 GS confirmed that the proposed timescales are agreed by the Authority.
- GC0111: Fast Fault Current Injection Specification Text
- 6450 SA confirmed that the workgroup report is due to be presented to the November 2018 Panel.
- GC0114: SOGL Prequalification Processes
- 6451 SA informed the Panel that the next workgroup was scheduled for 30 November 2018. She requested a one month extension to present the workgroup report to the Panel. The Panel agreed to the one month extension.
- GC0109: The open, transparent, nondiscriminatory and timely publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc., issued by or to the Network Operator(s).
- 6452 SA updated the Panel and informed them that there was a two hour Webex is currently planned for 31 October 2018. She advised that it was likely that a further workgroup would be required following the Webex and then a workgroup consultation. It is estimated that the workgroup report will be submitted to the January Panel for review.
- 6453 TM queried whether there was a better way to progress this modification.
- 6454 SA confirmed that things had moved on and there had been a number of workgroups held since the urgency letter from the Authority was received.
- 6455 RW stated that the proposal is more complicated than it first seemed and his view is that the workgroup is the best place to deal with these issues.
- 6456 DJ confirmed that it was originally thought that an email circulation list would be sufficient to deal with the issue. However, it has transpired to be far more complex.
- 6457 The Panel agreed to a two-month extension for Workgroup report to be submitted to the Panel. This is due to be submitted in January 2019.
- GC0096: Energy Storage
- 6458 SA confirmed that a timeline will be provided to the Panel following the two-day legal text review.
- GC0118: Modification to the Grid Code to accommodate the recent Distribution Code modification to Engineering Recommendation P28 –Voltage fluctuations and the connection of disturbing equipment to transmission systems and distribution networks in the UK
- 6459 SA informed the Panel that the next workgroup and the workgroup vote is provisionally scheduled for 5 November 2018.
- GC0103: Introduction of Harmonised Applicable Electrical Standards
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- 6460 SA highlighted that there is a risk that the current timetable may not be met (December submission of the workgroup report) due to the next workgroup being scheduled for November 2018.
- GC0107 and GC0113: The open, transparent, non-discriminatory and timely publication of the generic and/or PGM specific values required to be specified by the relevant TSO(s) and / or relevant system operator et al., in accordance with the RfG.
- 6461 SA confirmed that the Code Administrator was seeking a November date for the next workgroup.
- GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements.
- 6462 SA stated that this modification was being run parallel to CMP291 given the cross-code implications. The initial meeting was held on 11 October.
- GC0105: System Incidents Reporting
- 6463 SA informed the Panel that there had been issues with quoracy since this workgroup was established.
- 6464 TM advised that the CUSC Panel had noted the legal advice received from National Grid that that there must be at least five workgroups members to achieve workgroup membership quoracy. TM advised that, on the CUSC Panel's request, the Code Administrator has agreed to open up workgroup nominations every two months for workgroups that were not quorate. In the event that quoracy still could not be achieved then the modification is to be brought back to the CUSC Panel for further discussion.
- 6465 AC stated that if industry is not sufficiently interested in a modification then it should be low priority in terms of the priority stack.
- 6466 SA stated that the feedback with TM and industry is not necessarily around not having interest. There are a number of factors including the time commitments required or an understanding of the process or what the modification proposal is trying to achieve.
- 6467 TM confirmed that the CUSC Panel agreed that they would like be kept in the loop about quoracy issues.
- 6468 SA confirmed that the legal advice reiterated the code that there must be 5 workgroup members to form a workgroup and five workgroup members to vote on the proposal(s). What is less clear is whether a workgroup that has less than five members in attendance can go ahead where there is no vote. Clarity is being sought from National Grid's legal team.
- 6469 GV queried whether the Panel needs to look retrospectively at modifications in light of the legal advice received around quoracy, for example GC0112 where there were less than five workgroup members.
- 6470 LW requested that the legal advice is shared with the Panel. EH stated that Code Administration will need to consider legal privilege prior to any decision being made on sharing National Grid's legal advice as effectively National Grid may be waiving this by sharing it as National Grid is the client.
- ACTION 183:** Code Administrator to investigate and advise the Panel in relation to sharing the legal advice relating to quoracy and how this interacts with legal privilege or whether National Grid is willing to waive its legal privilege.
- 6471 AC raised a concern that there could be an issue if there are five workgroup members and one doesn't turn up to a Workgroup meeting but people have travelled a large distance to attend and then the Code Administrator cancels it, that will impact on the level of engagement in Workgroups.
- ACTION 184:** Code Administration to add quoracy of workgroups to a future agenda once the legal advice has been received.
- ACTION 185:** Code Administrator to feed in to the Customer Journey work regarding making meetings more accessible to industry participants e.g. locations.
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- 6472 GN informed the Panel that the legal text needed to be refined and drafted in relation to GC0105 and that he may require some support with this.
- 6473 The Panel agreed that to a 1 month extension so that the workgroup report can be submitted to the Panel in December 2018.

General discussion on the modification updates

- 6474 GN queried the slides in relation to the update given to Panel. He requested that the slides contain the date when the modification was first raised so that the Panel can see how long it has taken for the modifications to be progressed.
- 6475 SA confirmed to the Panel that the “On track/Off track” reference was in relation to the current timeline that has been agreed by Panel rather than the original timeline set up when the modification was first raised.
- 6476 TM requested that the spreadsheet contained within the headline report is circulated to the Panel with the Panel papers as this contained the information that GN was requesting.

ACTION 186: Code Administrator to distribute the table in the headline report when distributing the Panel papers.

Prioritisation Stack

- 6477 The Panel agreed that no amendments were required to be made to the prioritisation stack.

7. Implementation updates

- 6478 SA confirmed that we currently do not have any modifications that require implementation although it was noted by the Panel that GC0108 with currently with the Authority.

8. Draft final modification reports/draft self-governance reports

- 6479 SA confirmed that there are no draft modification reports or draft self-governance reports to be considered.

9. Electrical Standards

- 6480 GV requested that the Code Administrator thank Matthew Bent for his assistance and ensuring the Scottish electrical standards were uploaded onto the National Grid website.

10. Governance

- 6481 SA confirmed that there were no governance items to discuss.

11. Grid Code Development Forum and Workgroup Day

- 6482 SA informed the Panel that at the Grid Code Development Forum on 3 October 2018, two items were identified as part of the horizon scanning:
- i. Communication Standards (update to the electrical standards) is likely to be raised with the Panel within the next month; and
 - ii. Virtual Synchronous Machine/Fast Fault Current Injection modification is likely to be raised in January 2019)

6483 SA confirmed that at the next workgroup day it is planned that a workgroup for GC0111 will be held.

12. Reports to the Authority (current and anticipated submission)

6484 SA confirmed that GC0108 has been submitted to the Authority for decision.

6485 In addition, GC0112 will be submitted by the end of October 2018 and following this GC0106 will be submitted.

13. Standing items

6486 AC raised the issue of some of the links going to a generic page rather than the specific document e.g. the Distribution Code Panel updates. This was noted and the Panel secretary will ensure all links go to the correct document.

14. Impact of other code modifications or developments

6487 The Panel agreed to receive an update in relation to the Distribution Code Panel at the next Panel meeting in November 2018.

15. Code Governance Options for T2

6488 JT presented to the Panel analysis of the Code Administrator Code of Practice (CACoP) survey results. This included a comparison with the previous survey result. JT agreed to circulate the detailed results to the Panel.

ACTION 187: JT to circulate to the Panel the detailed results from the CACoP survey.

6489 JT highlighted the key areas that Code Governance would be focussing on in order to improve the service provided to stakeholders and customers. This included:

- i. how information is presented and shared on the website, which is a key element;
- ii. providing support in terms of new entrants including providing better support guiding people through the Code Modification process in the critical friend role;
- iii. looking at Code Manager type models within the industry and how National Grid can move to this; and
- iv. taking a more strategic view about developments and horizon scanning and looking at the consumer value objective.

6490 JT explained that under the Code Manager proposal, it was envisaged that the Code Administrator role will remain but Code Administration will offer extra options to industry and this will aim to address the feedback that the strategic issues are not being considered. Additionally, anything extra offered will need to ensure compliance with National Grid's Licence.

6491 TM stated that she agreed that the critical friend role needs to be developed and Code Administration needs to be more proactive in seeking out the key messages from industry.

6492 JT informed the Panel that he will be looking to develop these themes in both T1 and T2.

6493 LW queried whether National Grid was going to benchmark themselves against the leading Code Administrator? JT confirmed that National Grid would be looking to benchmark themselves against the leading Code Administrator and there was a need to deliver the same level of service others were.

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- 6494 LW stated that the service currently on offer from the Code Administrator comes across that the service is being delivered on a shoe string when industry wants a Rolls Royce service.
- 6495 DJ added that he would like to see improved telephone and video conferencing service. JC stated that Elexon's conferencing facilities are not that good either.
- 6496 JT stated that the funding for Code Administrator in T1 has not been that great. The main reason for this has been that it is a reactive function and therefore it is difficult to predict how many modifications are likely to be received and how complex they are likely to be when forecasting budgets. However, JT stated that he has tried to look at the how best to fund this.
- 6497 JT asked the Panel whether they had any views on the kind of process they would like to have to ensure that the process is properly funded and suggested that one option may be a Panel role in agreeing funding?
- 6498 LW suggested that an allowance for funding for National Grid to draft the legal text should be made.
- 6499 JT stated he would add into the plan an allocation to allow National Grid to undertake the drafting of legal text in T2.
- 6500 JC stated that one of the key aspects for Elexon is that any money that is not spent is given back to industry.
- 6501 JT confirmed that the funding model for the Electricity System Operator (ESO) is a profit model. He stated that the Elexon model is different to the National Grid ESO. JT stated that there will be incentives for Code Administration to achieve and that a model linked to performance is an option. For the service in T1 there isn't a reopener at present but these are options that could be explored for T2.

16. Joint European Stakeholder Group Presentation: System Operation Guideline and Emergency and Restoration Planning

- 6502 FD and RV gave a presentation to the Panel on the System Operator Guideline and Emergency Restoration Planning. The presentation covered the current in-flight Grid Code modifications (GC0106 data exchange requirements and GC0114 pre-qualification processes) and the future proposals for the three modifications.
- 6503 GN queried whether the data in relation to relevant assets will be shared with all market participants. FD advised that at present there is no clear view about how National Grid will share the list of relevant assets. RV confirmed that clarity will be sought in relation to this.
- 6504 GV requested that National Grid inform stakeholders who are affected first in advance of informing the rest of industry. FD stated that he does not think there is anything that would prevent this. However, LW stated that there may be a competition issue if some parties have information that others within the industry do not have. RW stated that it may be easier to share everything with industry providing there is no information or data that is commercially sensitive.
- 6505 RV confirmed that interconnectors will be considered to be blackstart providers. Additionally, RV confirmed that a modification in relation to Load Frequency Demand Disconnection will be raised and that testing is currently ongoing. AC queried whether the modification will just be around testing. RV clarified that the code modification may be wider than testing. RV confirmed that the consultation responses will be looked at to develop the scope of the modification.

ACTION 188: RV to re-circulate the link in relation to Emergency and Restoration Planning.

17. Derogations

- 6506 SS presented a presentation in relation to derogations to the Panel. SS explained that a derogation is a direction from Ofgem relieving a party from a particular obligation in a technical code.
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6507 SS confirmed that there are currently no key performance indicators on derogations but that Ofgem aim for delivery within a timescale of around 6 months.

6508 SS advised the Panel that there is further guidance on the Ofgem website about derogations.

18. AOB

6509 RW confirmed that P297 in relation to EBS was discussed at the Balancing and Settlement Code Panel and he will provide Panel with an update on GC0068 at the November 2018 Panel meeting. DJ queried whether there will be further information on EBS provided and RW confirmed that there will be further information about EBS in due course.

ACTION 189: RW to provide an update on EBSD and GC0068 at the November 2018 Panel.

6510 LW stated that there was a briefing sent out on EBS with an update on what was happening. It was agreed that RW would re-circulate the email in relation to EBS to the Panel.

ACTION 190: RW to re-circulate the email that was sent out to industry in relation to EBS.

19. Next meeting

6511 The next Panel meeting will take place at National Grid House (and WebEx) on **22 November 2018** commencing at **10am**
