

GC0120: National Grid legal separation changes to clarify Grid Code responsibilities and consequential changes

What stage is this document at?

01

Draft Grid Code Modification Fast Track Report

02

Approved Grid Code Modification Fast Track

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Any Questions?

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About this document

This Grid Code Modification Fast Track Proposal will be presented to the Grid Code Panel on 28 February 2019.

The Grid Code Panel will consider the Proposer's view, and agree whether this is a Grid Code Modification Fast Track Proposal and make a determination on whether to implement the modification.



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Document Control

Version	Date	Author	Change Reference
0.1	15/02/2019	Emma Hart	Grid Code Modification Draft Fast Track Proposal Report

1 Why Change

[GC0112 'National Grid Legal Separation Grid Code changes to incorporate NGESO'](#) was approved for implementation by the Authority on 3 December 2018. This will be implemented on 1 April 2019. GC0112 will modify the Grid Code to reflect the creation of a new National Grid Electricity System Operator (NGESO) titled 'The Company' that is legally separated from National Grid Electricity Transmission Limited (NGET) throughout the Grid Code in order to ensure the System Operator and Transmission Owner obligations are clear.

Prior to the approval of GC0112, there were four active Grid Code modifications, namely [GC0097](#), [GC0098](#), [GC0099](#) and [GC0104](#), whereby the legal text baseline used, did not take into account the changes that will be implemented by GC0112. As a result, incorrect references remain in the Grid Code in relation to which party is responsible for some of the obligations within the Grid Code. This modification is proposing to rectify these incorrect references, which can be found in section 2 and the legal text in Annex 1.

Additionally, in making its decision in relation to GC0112, the Authority directed the Code Administrator to undertake rectification of the definition of 'The Company' as the incorrect registered company details were specified. The Authority stated that it is expected that this error is rectified via a Fast Track Self Governance modification.

2 Solution

Following analysis of the Grid Code, with GC0112 overlaid, a number of outstanding inaccuracies have been identified that remain within the text. These are specified in the table below. No other changes are being introduced as a result of this modification.

Section	Defect
Glossary and Definitions	
Aggregator Impact Matrix	Change references to "NGET" to "The Company"
Demand Response Active Power Control	Change references to "NGET" to "The Company"
Demand Response Provider	Change references to "NGET" to "The Company"
Demand Response Reactive Power Control	Change references to "NGET" to "The Company"
Demand Response Transmission	Change references to "NGET" to "The Company"

Constrain Management	Company”
Demand Response Service	Change references to “NGET” to “The Company”
Demand Response Unit Document	Change references to “NGET” to “The Company”
Earthing	Change references to “The Company” to “NGET”
GB Synchronous Area	Remove “The Company”
Notification of Users Intention to Operate	Change references to “NGET” to “The Company”
Responsible Manager	Remove “The Company”
Small Power Station	Change references to “The Company” to “NGET”
Substantial modification	Change references to “NGET” to “The Company”
The Company	As directed by Ofgem, change the details to the following: National Grid Electricity System Operator Limited (No: 11014226) whose registered office is at 1-3 Strand, London, WC2N 5EH. Correct typographical error “whost” introduced by GC0112 to whose
Planning Code	
PC.A.5.4.3.1 (d)	Delete "owned or operated by The Company."
PC.A.6.1.3	Change references to “NGET” to “The Company”
PC.A.6.7.1	Change references to “NGET” to “The Company”
Connection Conditions	
CC.6.2.2.2.2 (a)	Change the first reference of “The Company” to “the Relevant Transmission Licensee”
CC.6.2.2.2.2 (b)	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.2.2.2.2 (c)	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.2.2.4	Change references to “The Company” to “the Relevant Transmission

	Licensee”
CC.6.2.3.1.1 (a)	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.2.3.1.1 (b)	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.2.3.1.1 (c)	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.2.3.5	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.5.5.1	Remove the text "applicable in ...Transmission Area "
CC6.5.6 (a)	Change the first reference to “The Company” to “Relevant Transmission Licensee”
CC6.5.6 (c)	Change references to “The Company” to “the Relevant Transmission Licensee”
CC.6.5.10	Change the first reference of “The Company” to “Relevant Transmission Licensee”
CC.7.4.13.1	Add in after “The Company” the following: ", in accordance with the Relevant Transmission Licensee, "
CC.A.6.2.4.4	Change references to “NGET” to “The Company”
CC.A.6.2.5.6	Remove “NGET”
European Connection Conditions	
ECC.6.2.1.2 (a)	Correction of sub-paragraph numbering i, ii, iii
ECC.6.2.1.2 (a) formally (iii) now (ii) in this modification	Change references to “NGET” to “The Company”
ECC.6.2.1.2 (a) formally (iv) now (iii) in this modification	Change references to “NGET” to “The Company”
ECC.6.2.1.2 (b)	Change the first “NGET” to “The Company” Change the second “NGET” to “the Relevant Transmission Licensee”
ECC.6.2.2.2.2 (b)	Change references to “The Company” to “the Relevant Transmission Licensee”
ECC.6.2.2.2.2 (c)	Change references to “The Company” to “the Relevant Transmission

	Licensee”
ECC.6.2.2.3	After “The Company” add "in accordance with the relevant transmission licensee,"
ECC.6.2.2.4	Change references to “The Company” to “the Relevant Transmission Licensee”
ECC.6.2.3.1.1 (b) (ii)	Change references to “The Company” to “The Relevant Transmission Licensee”
ECC.6.2.3.1.1 (c) (i)	Change references to “The Company” to “the Relevant Transmission Licensee”
ECC.6.2.3.5	Change references to “The Company” to “the Relevant Transmission Licensee”
ECC.6.2.3.6	Change references to “NGET” to “The Company”
ECC.6.2.3.7	Change references to “NGET” to “The Company”
ECC.6.2.3.8.1	Change references to “NGET” to “The Company”
ECC.6.2.3.8.2	Change references to “NGET” to “The Company”
ECC.6.2.3.10.1	Change references to “NGET” to “The Company”
ECC.6.2.3.10.2	Change references to “NGET” to “The Company”
ECC.6.4.5.1	Change references to “NGET” to “The Company”
ECC.6.4.5.2	Change references to “NGET” to “The Company”
ECC.6.4.5.3	Change references to “NGET” to “The Company”
ECC.6.4.5.4	Change references to “NGET” to “The Company”
ECC.6.5.6.4 (a)	Change the first reference to “The Company” to “The Relevant Transmission Licensee”
ECC.6.5.6.4 (c)	Change references to “The Company” to “the Relevant Transmission Licensee”
ECC.6.5.10	Change the first reference to “The Company” to “The Relevant Transmission Licensee”
ECC.7.2.3	Change references to “The Company” to “the Relevant Transmission Licensee”

ECC.A.5.5.1	Change references to “The Company” to “NGET”
ECC.A.5.6.1 (numbering repeated in the code)	Change references to “NGET” in both sections numbered ECC.A.5.6.1 to “The Company” Update the paragraph numbering for the second ECC.A.5.6.1 to ECC.A.5.6.2
Formally ECC.A.5.6.2 now ECC.A.5.6.3 in this modification	Change references to “NGET” to “The Company” Update the paragraph numbering for the second ECC.A.5.6.2 to ECC.A.5.6.3
Balancing Code 1	
Contents (BC1.5 and Appendix 2)	Change “NGET” to “The Company”
BC 1.6.1 (iv)	Change “NGET” to “The Company”
Balancing Code 4 *NB this document is not affected by GC0112	
Throughout the document	Change “NGET” to “The Company”
Data Registration Code	
Schedule 5	Change “NGET” to “The Company”
Schedule 15	Change “NGET” to “The Company”
General Conditions	
ANNEX: Table a, item 1	Change “NGET” to “The Company”

3 Proposed Legal Text

The complete proposed legal text can be located in Annex 1 below.

The legal text baseline used is the current baseline (as of 15 February 2019) with GC0112 overlaid for completeness.

The changes this modification seeks to introduce as specified in the table in section 2 above, are shown highlighted in yellow within Annex 1.

4 Grid Code Panel Approval

On 28 February 2019, the Grid Code Modifications Panel will consider whether GC0120:

1. meets the fast track criteria;
2. meets the Self Governance criteria; and
3. whether the Grid Code Modification should be made.

It is the view of the proposer that this Proposal meets the Fast Track and Self Governance criteria. These criterion are set out below:

Fast Track Criteria

A proposed Grid Code Modification Proposal that, 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

Self-Governance Criteria

A proposed Modification that, if implemented,

- (a) is unlikely to have a material effect on:
 - (i) existing or future electricity consumers; and
 - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity; and

- (iii) the operation of the National Electricity Transmission System; and
 - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
 - (v) the Grid Code's governance procedures or the Grid Code's modification procedures, and
- (b) is unlikely to discriminate between different classes of Users

5 Proposed Implementation

It is proposed that the GC0120 Grid Code Modification Fast Track Proposal is implemented on the 1 April 2019 following implementation of GC0112 as this proposal deals with typographical errors contained within the GC0112 legal text.

This will follow publication of the approved Grid Code Modification Fast Track Report providing no objections have been raised as per the objection process described in Governance Rule 26.12.

Date	Activity
28 February 2019	Draft Grid Code Modification Fast Track Proposal Report presented to the Grid Code Panel
4 March 2019	Publish approved Grid Code Modification Fast Track Report
25 March 2019	Appeal window closes
1 April 2019	Code Administrator to implement GC0120

6 Objections (as per section GR.26.12 of the Governance Rules)

If GC0120 is approved by the Grid Code Modifications Panel, there will be an opportunity for an objection to be raised to the Modification.

The Approved Grid Code Modification Fast Track Proposal will not be implemented if an objection is received.

The Grid Code Panel Secretary will notify the Grid Code Panel, the Authority and Grid Code Parties if an objection is received.

The Grid Code Panel Secretary shall notify the Proposer that additional information is required if the Proposer wishes the Grid Code Fast Track Modification to continue as a Grid Code Modification Proposal.

