

Meeting minutes

Grid Code Review Panel

Date: 28/03/2019	Location: Faraday House, Warwick
Start: 10:00	End: 14:00

Participants

Attendee	Attend/Regrets	Attendee	Attend/Regrets
Trisha McAuley, Chair (TM)	Attend	Damian Jackman, Generator Representative (DJ)	Attend
Matthew Bent, Code Administrator Representative (MB)	Attend	Robert Longden, Supplier Representative (RL)	Attend
Emma Hart, Technical Secretary (EH)	Attend	Alan Creighton, Network Operator Representative (AC)	Attend
Joseph Underwood, Generator Representative (JU)	Attend	Graeme Vincent, Network Operator Representative Alternate, (GV)	Attend
Alastair Frew, Generator Representative (AF)	Attend	Rob Wilson, National Grid Electricity System Operator Representative Alternate (RW)	Attend
Chris Smith, Offshore Transmission Representative (CS)	Attend	Greg Heavens, National Grid Electricity System Operator – Observer (GH)	Attend
Ross McGhin, Onshore Transmission Representative (RM)	Attend	Gurpal Singh, Authority Representative (GS)	Attend
Jeremy Caplin, BSC Representative (JC)	Attend	Nadir Hafeez, Authority Representative - Observer (NH)	Attend
Rob Marshall, Code Governance Manager (RMA) - observer	Attend	Chrissie Brown – presenter item 6 (CB)	Attend item 6
Rachel Woodbridgestocks – presenter item 6 (RWB)	Attend item 6	Sarah York – presenter item 20 (SY)	Attend item 20

Discussion and details

1. Introductions and apologies for absence

- 6901 TM opened the Grid Code Review Panel ('the Panel') meeting with introductions and acknowledged the advance apologies received from the following Panel members:
- Colm Murphy (alternate Rob Wilson);
 - Steve Cox (alternate Graeme Vincent);
 - Guy Nicholson.

2. Approval of Panel minutes

Minutes 28 February 2019

- 6902 Subject to the minor amendments raised by TM by email in relation to recording of actions, the Panel agreed that the minutes from the Panel held on 28 February 2019 are approved as a correct record of the meeting.

Minutes 14 March 2019 (Special Panel minutes)

- 6903 The Panel agreed that the minutes from the Panel held on 28 February 2019 are approved as a correct record of the meeting.

3. Review of Actions within the Action Log

Action 207

- 6904 The Panel reviewed the slide in relation to the blockers to progressing modifications and agreed that this would be useful (see below).

- 6905 The Panel agreed to close this action.

Action 212

- 6906 TM informed the Panel that she had yet to meet with Rob Marshall and Gareth Davies to discuss the process for clarifying where responsibilities sit for drafting the legal text to support modifications. TM confirmed that an update will be provided at the April 2019 Panel meeting.

Action 215

- 6907 MB confirmed that he had contacted AMPS and the Panel agreed to close the action.

Action 216

- 6908 MB confirmed that governance rule GR.22.4 was circulated with the Panel's papers. The Panel agreed to close action 213.

Action 217

- 6909 MB confirmed that the weblink to the Modification Tracker and the Frequently Asked Questions was circulated to the Panel with the Panel's papers. The Panel agreed to close action 214.

Action 218

- 6910 MB confirmed that the newsletter was included in the Panel's papers for information. The Panel agreed to close action 215.
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Deferred Actions

6911 The Panel requested that an update on the deferred actions is provided at the next Panel meeting.

ACTION 219: Code administrator to provide an update on the deferred actions.

4. Chair's update

6912 TM confirmed that she had no update to share with the Panel.

5. Authority Decisions

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

6913 GS confirmed that the decision in relation to GC0106 was issued on 8 March 2019 with an implementation date 14 March 2019. MB confirmed that GC0106 has been implemented in to the Grid Code.

6914 DJ queried the GC0106 decision letter as it stated that the proposer for the alternative did not provide the evidence needed to make a decision. DJ asked whether in the event that Ofgem decides it needs further information to inform its decision, whether they would contact either the Proposer of any alternative or the Code Administrator to seek that evidence. In addition, for Workgroup Alternative Grid Code Proposals, DJ queried the level of information Ofgem required.

6915 GS confirmed that if on the basis of the information provided in the Final Modification Report a decision cannot be made, then Ofgem may send the modification back to the Panel and request the information it requires to inform its decision. It will be sent back to the Panel to obtain that further information. However, if the information needed is for clarity, this may be sought from the Code Administrator.

6916 JU stated that in order to avoid modifications going to Ofgem and getting sent back, the Panel should be looking ensure there is sufficient information within the Final Modification Report. In addition, JU added that this responsibility sits with the Workgroup and Proposers of Alternative Solutions.

6917 RL stated that he believed that responsibility also sits with the Workgroup Chair to ensure the Workgroup Report has sufficient information to support the solution.

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

6918 GS confirmed that GC0118 was currently with Ofgem for consideration. GS confirmed that Ofgem are aiming to publish a decision on this modification within the Key Performance Indicator timescales.

6. New Modifications

GC0123: Clarifying references to NGET and Relevant Transmission Licensees

6919 GH introduced the modification to the Panel. GH stated that National Grid Electricity Transmission Operator was keen for this new modification to be raised as soon as possible following the March 2019 Special Panel meeting due to GC0122 moving obligations from the National Grid Electricity System Operator (National Grid ESO) to the National Grid Transmission Operator (NGET) in the interim until the

analysis of the Grid Code has been completed by a Workgroup in relation to which NGET references should be changed to “Relevant Transmission Licensee”.

6920 GH stated that he is intending to have a draft of the legal text ready prior to the first Workgroup. This has not been produced for the Panel due to the pending implementation of the legal separation modifications (GC0112, GC0120 and GC0122).

6921 RW informed the Panel that Ofgem had requested this modification to be raised and implemented as soon as possible to provide clarity to Grid Code users.

6922 GV observed that Transmission Operators are not referred to in the self-governance criterion. RW confirmed that this was due to the Grid Code not applying to Transmission Operators.

6923 GS queried whether the Panel thought that this modification was material in light of the self-governance criterion. GH stated that his view is that materiality is low as these obligations are already undertaken by the Scottish Transmission Operators and therefore there will be no change in the functions they currently fulfil.

6924 The Panel discussed whether there should be a Workgroup for this modification. AF stated that in order to ensure all of the relevant issues have been considered, his view is that a Workgroup would be appropriate. RW agreed with this view and stated that by having a Workgroup, all of the relevant issues will be highlighted and addressed.

6925 GS informed the Panel that it would be useful to have a single Workgroup meeting and then it can be expedited through the process with as short a timeline as possible.

6926 The Panel agreed that the modification meets the self-governance criterion and a Workgroup for this modification should be formed.

6927 AC queried whether there were any pending modifications that needed to be checked in relation to the legal separation modifications.

6928 EH confirmed that only GC0106 modification was potentially affected by the legal separation modifications. EH confirmed that this has been checked to ensure that there were no unforeseen impacts.

GC0123 Terms of Reference

6929 The Panel discussed the terms of reference for the Workgroup.

6930 CS stated that a consideration of the impact on the Relevant Transmission Licensees should be added. RM stated that he supports this.

6931 MB stated that the next steps will be to open up the nomination window, which will be for three weeks. MB confirmed that the first Workgroup will be held in May on one of the Workgroup days.

6932 The Panel agreed that the Workgroup report should be brought back to the Panel in May 2019.

GC0124: Critical Friend review period for submission of new modifications

6933 CB introduced the modification to the Panel.

- 6934 CB informed the Panel that at present, the Code Administrator often does not have sufficient time to effectively perform its critical friend role and review the quality of new modifications which are raised by industry, as modifications can be raised as late as 5pm on the Panel's papers day.
- 6935 CB informed the Panel that as part of the pre-work to raising the modification, she attended the Grid Code Development Forum (GCDF) and CUSC Issues Standing Group. CB stated that her modification proposes that the cut off for receipt date for new modifications would be the Panel date – 10 working days.
- 6936 TM queried the feedback received on this modification from industry at the GCDF. CB informed the Panel that there was broad support for the proposed changes. CB advised that there were questions about what the Code Administrator will be doing during the extra days, should the modification proceed.
- 6937 JC informed the Panel that ELEXON uses guidance that provides them with additional time to assess the proposed new modifications.
- 6938 CB informed the Panel that other Code Administrators vary in terms of cut off dates from 10 working days to three working days.
- 6939 AF queried whether the 10 working days will apply to all industry participants including the Electricity System Operator.
- 6940 CB confirmed that the change will apply to all industry participants including National Grid ESO.
- 6941 TM stated that her understanding was that this modification was to help address issues with the quality of proposed modifications.
- 6942 AC queried what would happen in the event that a modification proposal was received by the Code Administrator after the cut-off date, and whether this should be codified.
- 6943 CB confirmed that the modification proposal would be scheduled for the following Panel meeting.
- 6944 JU expressed that he would like the Code Administrator to be flexible about the tabling of new modifications e.g. if there is a light month in terms of Panel business and a new modification proposal is received with 9 days prior to the Panel his view is that it should be tabled at the Panel meeting. JU suggested that the Code Administrator could issue some guidance around this. CB confirmed that advice to users of the Grid Code will be provided.
- ACTION 220:** Code Administrator to provide updated guidance to Grid Code users in relation to raising new modifications.
- 6945 RM stated that he supported this modification. In addition, RM stated that the Code Administrator having discretion with the tabling of modifications would be beneficial in enhancing the quality of modification proposals.
- 6946 AF observed that it seems strange that a fast track modification has a longer lead in time of 10 working days with discretion to be 5 working days.
- 6947 The Panel discussed whether the modification met the self-governance criterion.
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- 6948 DJ queried whether this modification has a material impact on the governance procedure as set out in part v as the guidance does not refer to the timescales.
- 6949 MB read out the materiality guidance.
- 6950 The Panel confirmed that they agree that this modification is not material and therefore can follow the self-governance process. The Panel further agreed that this modification should proceed to Code Administrator Consultation.
- 6951 JU queried what would happen if the CUSC Panel decide that their modification should go to a Workgroup? MB confirmed that the CUSC modification will proceed as agreed by the CUSC Panel and this modification would continue to follow the governance route agreed by the Panel.
- ACTION 221:** CB to feed back to the Grid Code Panel the discussion at the CUSC Panel.
- 6952 MB informed the Panel of the next steps in relation to the timeline as set out on the slide.
- GC0125: EU Code Emergency & Restoration: Black Start testing requirements for interconnectors
- 6953 RWB introduced the modification to the Panel.
- 6954 RWB informed the Panel that this modification follows on from GC0108 in relation to Emergency and Restoration. This modification will introduce black start testing in to the Grid Code for interconnectors. The proposal provides a first draft of the legal text but the intention is that this will be refined through the Workgroup process. RWB proposed that this modification proceeds to a Workgroup as the feedback received on GC0108 is that a Workgroup should have been held.
- 6955 RWB stated that measures are being taken to secure quoracy for this Workgroup including Panel member support (JU and CS), the Code Administrator is running a webinar during the nomination window and a newsletter will help to raise awareness.
- 6956 CS stated that he will attempt to raise interest through the interconnector forum.
- 6957 CS queried how black start is covered in relation to energy storage. AF confirmed that black start refers to generators and power stations.
- 6958 GH informed the Panel that GC0096 covers energy storage including black start, and that the GC0096 Workgroup report which will come to the Panel.
- 6959 GV informed the Panel that the Grid Code referred to HDVC systems rather than black start. RWB confirmed that the legal text drafting will refer to HDVC systems rather than specifically black start.
- 6960 RM stated that the direction of travel is that interconnectors are treated the same as generators.
- 6961 RWB informed the Panel that it would be good to have generators and interconnectors in the Workgroup in order to find a balance between what is required and equal treatment. RWB stated that she was aiming to do pre-work to help facilitate the discussions in the Workgroup.
- 6962 RL stated that in relation to engaging interconnectors, it is useful to be mindful of the other work that is ongoing in terms of black start for interconnectors.
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6963 The Panel considered the modification and agreed that the modification should proceed on the standard modification governance route and should proceed to a Workgroup.

GC0125 Terms of Reference

6964 The Panel discussed and set the terms of reference for the Workgroup.

6965 The Panel agreed that the Workgroup report should return to the Panel in July 2019.

GC0126: Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068

6966 GH introduced the modification to the Panel.

6967 GH informed the Panel that a Cost Benefit Analysis (CBA) was undertaken to establish whether it was worth progressing with the unimplemented aspects of GC0068. The CBA concluded that Stable Import Limits (SIL) and Stable Export Limits (SEL) would be worth pursuing. This modification is looking to bring in SIL and SEL into the Grid Code. The modification will review the GC0068 legal text to decide whether the unimplemented provisions are still fit for purpose. GH further stated that he anticipated that there would be a need for only one Workgroup to conclude this modification.

6968 AF stated that the issue with GC0068 was that it was not implemented as there was no practical way to implement it. AF queried whether this will be a similar modification?

6969 RW informed the Panel that the intention is to reverse the parts of GC0068 where the CBA did not identify a positive benefit.

6970 JU queried whether SIL and SEL would be optional or compulsory? GH confirmed that these it will be optional.

6971 The Panel discussed the governance route for the modification and agreed that this modification should be self-governance with a Workgroup.

GC0126 Terms of Reference

6972 The Panel discussed and set the terms of reference for the Workgroup.

6973 The Panel agreed that the Workgroup report should be presented at the Panel to align with the introduction of the IT system changes required to implement the proposed Grid Code change.

ACTION 222: GH to develop the timeline and report back to the Panel with when the IT system changes will be implemented.

7. Current modification updates and current Panel priority order

GC0109: The open, transparent, non-discriminatory 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).

6974 MB informed the Panel that a Workgroup took place on 27 March 2019 and it was quorate.

GC0096: Energy Storage

6975 MB informed the Panel that the Workgroup report was due to be submitted to this Panel. However, a decision was made not to submit the Workgroup report as it was not of sufficient quality. This was due to the modification running over a couple of years (pre-open governance). The intention is to review the Workgroup report and remove duplication within the report and improve its readability. This will not impact upon the time line for the modification being sent to the Authority for decision due to gaps in the timetable between Panels with the Easter bank holidays.

6976 AC queried whether the Code Administrator could do this as it is the Workgroup's report.

6977 EH confirmed that the changes were solely editorial and that the Workgroup report will be circulated around the Workgroup for comment and sign off prior to it being submitted to the Panel.

6978 The Panel were content with the proposal.

GC0103: Introduction of Harmonised Applicable Electrical Standards

6979 MB informed the Panel that the Workgroup had made some progress on progressing the modification. However, he anticipated that at the April 2019 Panel a request for a three-month extension will be made.

6980 AC queried whether the proposed solution will require Relevant Electrical Standards (RES) document changes.

6981 MB confirmed that the proposal will require changes to the RES documents.

ACTION 223: GH as chair to consider which parties are impacted by the modification.

ACTION 224: AC to ensure that distribution network users are aware of the GC0103 modification.

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.

6982 MB presented the proposed time line for the Panel to review. The Panel agreed to a three-month extension on this modification.

GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements.

6983 The Panel noted the update provided on GC0117.

GC0105: System Incidents Reporting

6984 MB requested a two-month extension for GC0105.

6985 RL stated that it would be helpful if extensions were flagged in advance of Panel meetings so that Panel members are better sighted on extension requests.

6986 EH explained that GC0105 has five Workgroup members and under the Governance Rules a minimum of five Workgroup members must attend or dial in to the Workgroup in order for a vote to take place. EH further explained that there had been difficulties in getting all five Workgroup members together. EH stated that she was hoping to be able to confirm a date for the vote at the Panel today but due to the date being unknown, a two-month extension is required.

6987 The Panel agreed to a two-month extension in relation to GC0105.

Discussion on modification blockers

6988

The Panel discussed the modification blockers table within the Panel pack.

6989

RW stated that he suspected that the delays for GC0111 were due to late comments on the solution. AF confirmed that one of the fundamental issues with GC0111 was that what was agreed at the pre-meeting and what was presented on the day were different and therefore there were issues that needed to be addressed.

6990

AF queried whether the Panel could receive the blockers table monthly if it was going to be updated monthly by the Code Administrator in any event.

6991

The Panel agreed that the blockers table should be discussed quarterly as an agenda item. The table will continue to form part of the slide pack in the interim months.

6992

The Panel agreed that “NGET led delay” should be amended to “Stakeholder led delay”. TM advised that this is consistent with the CUSC changes.

6993

NH queried whether the figures within the table reflected the number of extension requests for each modification? MB confirmed that the numbers are just the number of occurrences rather than the number of extension requests made to the Panel. Panel agreed we should have number of extension requests.

ACTION 225: MB to update the blockers table to include the number of extension requests each modification has had.

Discussion on Prioritisation

6994

DJ stated that he would like to see GC0105 completed as this would be very useful to industry.

6995

The Panel agreed that the comment on the prioritisation stack next to GC0105 should be removed.

ACTION 226: MB to remove the commentary next to GC0105.

6996

The Panel agreed that the existing modifications should remain in the order that they currently are in.

6997

The Panel prioritised the new modification GC0123, GC0125 and GC0126.

GC0123: Clarifying references to NGET and Relevant Transmission Licensees

6998

The Panel agreed that GC0123 should be second from top of the prioritisation stack as this is a requirement that has been requested by Ofgem and is needed for Legal Separation for the Grid Code to be correct.

GC0125: EU Code Emergency & Restoration: Black Start testing requirements for interconnectors

6999

The Panel agreed that GC0125 should be at the top of the prioritisation stack as this modification is compliance driven.

GC0126: Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068

7000

The Panel agreed that GC0126 should be at the bottom of the prioritisation stack as there is a longer time line on this modification in terms of implementation, which at present is unknown.

7001

MB confirmed that GC0124 will appear on the additional slide that captures the modifications that are not in a Workgroup phase.

7002

GC0121: Grid Code changes in the event the UK leaves the EU without an agreement

7003 GS stated that he noted that there was a hold in diaries for a Special Panel on 1 April 2019. However, given recent events, the earliest date the Special Panel can now be held is 12 April 2019, should this be required.

7004 AF stated that the issue is that we do not know what will happen and therefore a vote can not be held prior to 12 April 2019.

7005 MB stated a Special Panel meeting may be held on 15 April 2019 in accordance with Rachel Hinsley's email to the Panel.

Rob Marshall stated that with GS's update, he is content to hold the 15 April 2019 for a Special Panel on a similar basis to last time, where consideration of the Draft Final Modification Report may be voted on.

8. Workgroup reports

GC0111

7006 MB introduced the Workgroup report to the Panel. MB informed the Panel that the intention was for the GC0111 Code Administrator Consultation should run concurrently with the Distribution Code consultation.

7007 Panel agreed to send GC0111 to Code Administrator Consultation.

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

7008 There were no draft final modification reports or draft self-governance reports to discuss.

10. Reports to the Authority

7009 There were no reports sent to the Authority.

11. Implementation Updates

7010 There were no implementation updates.

12. Electrical Standards

7011 There were no electrical standards to discuss.

13. Governance

7012 The Panel discussed holding a Panel meeting in both London and Glasgow. The Panel agreed that this would be good to trial.

7013 DJ offered to hold a Panel meeting in Glasgow at SSE's offices.

7014 JU agreed to explore holding a Panel in London.

ACTION 227: JU to explore holding a Panel meeting in London and to report back to the Panel and Code Administrator.

ACTION 228: MB to explore dates to see which dates would be suitable to hold the Panel in London and Glasgow.

14. Grid Code Development Forum and Workgroup Day

7015 RW informed the Panel that the ENA has agreed to raise a modification in relation to the changes on G5 issue 5. RW advised that this has not occurred yet.

ACTION 229: MB to circulate the email in relation to G5/5 to the Panel.

7016 RW advised that the consultation on G5/5 closes on 9 April 2019. In addition, in relation to this there are two stakeholder events that are being held in Glasgow and London.

15. Standing items

Joint European Stakeholder Group

7017 MB gave a verbal update on the February JESG meeting that took place at Elexon in London. MB stated that Rachel Woodbridge-Stocks (NGESO) presented her Emergency & Restoration modification proposals.

7018 MB also stated that the Department for Business, Energy & Industrial Strategy (BEIS) attended to provide an update on BREXIT. MB informed the panel that a Webex meeting is being held in the diary on the 16 April 2019 for all JESG stakeholders in the event the UK leaves the EU with a No Deal.

20. AOB

National Grid ESO Energy Code Review thought piece

7019 SY gave a verbal update on the National Grid ESO Energy Code Review work that she is leading on. SY advised that the work on the Codes Review links to the National Grid ESO's forward plan under Principle 4.

7020 SY stated that the focus of the work is to look at reform of the codes in order to achieve benefits for industry. This includes ensuring the codes are

- easy to navigate (smaller codes with clear navigation);
- in plain English e.g. shorter sentences; and
- the content of the codes is simplified.

7021 SY advised that this work is considering the resources required to simplify the codes. In addition, there is a need to follow a transparent process so that trust can be built whilst risk is balanced.

7022 AC queried whether there was a desire to change the technical requirements in the context of simplifying the codes.

7023 SY confirmed that the work is not looking to change any of the content but rather changing the language to aid understanding.

7024 JC queried when the work on the Codes Review is likely to be completed?

7025 SY confirmed that at present the timescales are unknown

7026 RM queried whether SY would like any Panel input into the work?

7027 SY stated that it is good that the Panel would like to support and assist in the development of this work. SY stated that she will consider the best way forward as the work develops.

7028 AC queried whether this work affects all Code Administrators or just the National Grid ESO Code Administrator?

7029 SY confirmed that this is a National Grid ESO Code Administrators led piece of work.

List of Significant Grid Users

7030 DJ queried when the list of Significant Grid Users will be available?

7031 RW stated that this list links to the Emergency and Restoration work. RW stated that there is a difference in opinion as to whether the list of Significant Grid Users is needed. Some Member States and Transmission Operator's will not be publishing a list and the intention is that National Grid ESO will not be publishing a list either. RW advised that National Grid ESO was looking to publish a list of principal groups rather than individual users as otherwise it will be out of date quickly.

7032 RW confirmed that this could be addressed as part of the ongoing plan for the Emergency and Restoration work.

Code Administrator Code of Practice (CACoP) Forum

7033 MB informed the Panel that RH attends the CACoP Forum from the Code Administrator with Rob Marshall as the current chair. RH has emailed an update from the CACoP Forum and MB agreed to circulate this email to the Panel.

ACTION 230: MB to circulate the CACoP Forum update email to the Panel.

7034 Rob Marshall informed the Panel that National Grid ESO is currently hosting the CACoP Forum. As part of this work, the CACoP Forum is considering the energy codes review and how the Code Administrators can improve how service is delivered to industry.

21. Next meeting

7035 The next Panel meeting will take place at Faraday House (and WebEx) on **25 April 2019** commencing at **10am**
