The ESO Code Administrator: the modification process

#### Introduction

We, as the Electricity System Operator, administer the Connection and Use of System Code (CUSC), The Grid Code and the System Operator Transmission Owner Code (STC) We also administer the Security of Supply Standard (SQSS).

#### What are the codes?

- The Connection and Use of System Code (CUSC) is the contractual framework for connection to, and use of, the National Electricity Transmission System (NETS).
- The Grid Code specifies technical requirements for connection to, and use of, the NETS. Compliance with the Code is a requirement under the Connection and Use of System Code (CUSC).
- The System Operator Transmission Owner Code (STC) defines the relationship between the transmission system owners and the system operator.

#### What do we do?

We, as **Code Administrator** act as your **critical friend** as and when you need us. From the initial thought in your head when you want to raise a modification to the implementation of changes to our codes. From informing you of key changes and potential impacts to guiding you through the modification process at each stage. We are here to assist at every stage.

#### Why have we made this booklet?

This booklet aims to assist in the understanding of the Governance processes that are in place and where you can contribute in the process should you wish to.

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# **Grid Code and Connection and Use of System Code modification process diagram**





#### The Governance Route options

The route a modification takes is determined by the respective Code Panel. They make this decision by assessing the materiality of a modification and whether there could be more than one option to solve the issue that has been raised. They also take into consideration how developed the legal text for the modification is and whether this needs further development. The table below summarises the options.

	Material impact (Authority decision)	Non-material impact (Panel decision)	Fast track criteria (typographical) (Panel decision)
Range of potential solutions (Workgroup)	Standard. Complex modification with potential to have more than one solution. Development is still required on the modification and impacts to be fully explored.	Self-Governance Workgroup. Modification will not have a material impact but the solution needs more development.	N/A
One solution (non- Workgroup)	Authority decision direct to Code Administrator Consultation. A modification that has one solution with fully developed legal text.	Self-Governance direct to Code Administrator Consultation. Modification will not have a material impact	Fast Track. Panel approval at meeting submitted to. Typographical amendments to the Code.

#### **Timescales for modifications**

Timescales can vary significantly between modifications with different levels of complexity or prioritisation. The table below gives an indication of what can be expected.



Governance route	Approximate Timescale
Standard. Complex modification with potential to have more than one solution. Development is still required on the modification and impacts to be fully explored.	The Workgroup is required to report back to the CUSC Panel in four months and six for the Grid Code. It will then progress to Code Administrator Consultation and to the Authority for decision.  Total = a minimum of 8 months for CUSC and 10 for the Grid Code.
Self-Governance Workgroup.  Modification will not have a material impact but the solution needs more development.	The Workgroup is required to report back to the CUSC Panel in four months and six for the Grid Code. It will then progress to Code Administrator Consultation and to the Panel for decision. Total = a minimum of 7 months for CUSC and 9 for the Grid Code.
Authority decision direct to Code Administrator Consultation. A modification that has one solution with fully developed legal text.	12-14 weeks dependent on the scheduling of Panel meetings
Self-Governance direct to Code Administrator Consultation. Modification will not have a material impact. Solution fully developed.	<b>10-12 weeks</b> dependent on the scheduling of Panel meetings.
Fast Track Panel approval at meeting submitted to. Typographical amendments to the Code.	5 weeks

#### Feeding into the processes we administer

There are a number of ways you can feed in;

- Feed into the Panel members on each code any feedback on the modifications raised
- Respond to Workgroup Consultations
- **Become** a Workgroup member or Observer at Workgroups
- Participate in webinar polls when webinars conducted during the process

- Respond to Code Administrator Consultations
- Tell us where we can improve and how our communication is working

#### Raising a modification

If you have identified an **issue or 'defect'** within one of the codes that we as the National Grid Electricity System Operator (NGESO) Code Administrator administer, then we would recommend that the following steps are undertaken to make the process as successful as possible;

- 1. Speak to us to make us aware that you would like to raise a change (modification) to the way that one of the codes work. We will offer guidance on what your options are to take your change forward, whether there are any other modifications currently in the process that are looking to make a similar change and advise on likely timescales for the change to go through the process.
- 2. Take the issue to a **forum** to discuss the proposed change with other industry members. This step aids and informs you, as Proposer, of the general support for the change to be made. Feedback will also be given on any solution you have thought of to date and will give you an idea of other solutions that industry may raise.
  - The forums that we administer are the Grid Code Development forum (GCDF) for potential Grid Code changes and the Transmission Charging Methodologies Forum (TCMF) for potential charging modifications (Section 14) and in addition the CUSC Issues Steering Group (CISG) for potential non-charging modifications to the CUSC (all other sections of the CUSC)
- **3. Draft the modification**. The proposal form that is used to formally raise a change to our codes can be located on the respective code area here:
  - https://www.nationalgrideso.com/codes If you require any

guidance on completing this then please get in touch with us, we are always on hand and happy to assist in our critical friend role.

- 4. Submit a draft modification to the Code Administrator. We kindly request that all modifications that are to be tabled at a Panel meeting for discussion are submitted to us as soon as possible and no later than three business days before papers day (papers day for the Panel is five working days ahead of the meeting) This will allow us to provide feedback on the Proposal and work with you as Proposer to make the process as successful as possible.
- 5. Attend Panel meeting. Following the submission of your proposed change you will be required to attend the Panel meeting to talk through the change so the Panel can assess which route the modification should follow. Slides will need to be drafted and submitted to the Code Administrator to be circulated to the Panel members five working days ahead of the meeting.

#### The Workgroup process for CUSC and Grid Code

#### Workgroup membership

If you have seen a modification be raised and want to become a Workgroup member we, are on hand to talk you through this if you have any questions on what this would entail. The nomination form (which outlines your details and what expertise you would bring to the Workgroup) can be located in the respective code area for each code on the National Grid ESO website. This is also sent out as part of the email we send seeking membership for all workgroups.

You will note that the form requests you to inform us of whether you are on Schedule 1 (list of Users) or whether a party on this

list has nominated you to be a Workgroup member. This is a requirement in our codes.

If you cannot obtain a nomination and want to be part of a Workgroup we can assist in helping you gain this nomination or there are additional options such as being an Observer (also great if you want to know what's going on but don't have the time to be heavily involved) or being on the modification mailing list.

#### Your role as a Workgroup member

As a Workgroup member, we require you to;

- Act in the best interest of the end consumer and industry as a whole
- Actively participate in meetings when in attendance
- Feedback and add comments to discussions held within timescales requested (not less than five working days)
- Be respective of others views within meetings

## The difference between a Workgroup Consultation and a Code Administrator Consultation

The Workgroup Consultation is the Workgroup gaining views from all of industry on what solution to arrive at and whether there are any other options that they haven't thought off. Your response here can really shape where the proposed change goes to and ensures all views have been considered.

The Code Administrator Consultation is carried out once the solutions have been finalised to gain all of industry's views on whether the solutions are better than what is in the code today. This is done by assessing against the code objectives.

#### **Different solutions proposed in Workgroups**

If another option (potential alternative) is brought to a Workgroup, either by a Workgroup member or a respondent to a Workgroup Consultation then the Workgroup have to assess whether to progress the option into a full alternative which would be worked up the same way as the Original Proposal and submitted to either the Panel or Authority for a decision on whether to implement the proposed change.

They make this assessment by carrying out an Alternative Vote. This entails assessing the option against the codes applicable objectives to see whether each Workgroup member is of the view that it would be better facilitated if this change were to be made to the code when compared to what is in the code at the time of the vote.

If the Workgroup do not support the proposed alternative, then the Chair of the Workgroup will also make the assessment and if they do think it does better facilitate the objectives when compared to the respective code today, the alternative will be fully worked up.

## Raising an alternative solution when not part of a Workgroup: can you?

When the Workgroup carry out their Workgroup Consultation you can raise a request for the Workgroup to assess the idea you have. This is done by filling in an alternative form as part of the Consultation and your response. If you are not part of the Workgroup, then you will need to add sufficient detail for the Workgroup to assess the option. You can, in addition, attend the next Workgroup to present your idea and see what happens in terms of progressing what you have raised. The alternative form

can be located in the respective code areas on the National Grid ESO website.

#### The Workgroup Vote

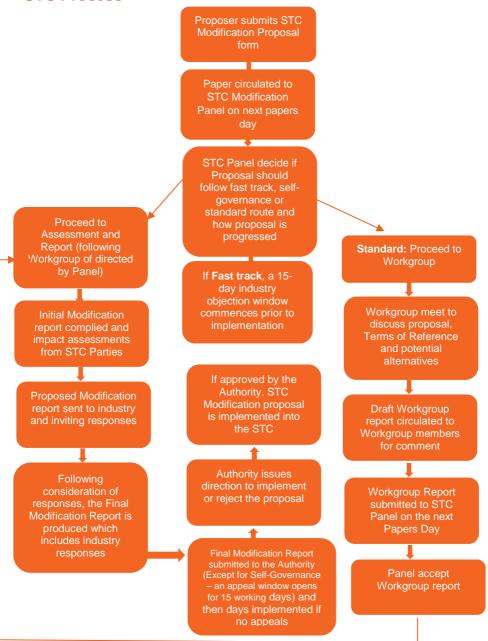
This is carried out at the end of the Workgroup process to gain the views of each Workgroup member ahead of being issued to the respective code Panel. This is carried out by assessing the proposed change and any other options against the codes applicable objectives. You as the Workgroup member or an alternate need to attend half of all the meetings held on the modification in order to cast your Workgroup Vote.

#### The Workgroup Terms of Reference

The Terms of Reference for each Workgroup are set by the Panel. The Panel assess the modification and determine the scope for the Workgroup, in essence what the Panel are tasking them to complete ahead of reporting back to them at a specific Panel meeting. There is a standard Terms of Reference which is talked through at the start of the initial Workgroup meeting so all members are clear on the ask for the group. If the Workgroup want to add anything to the scope this can be requested of the Panel.

#### The STC and STC Procedure (STCP) processes

#### **STC Process**

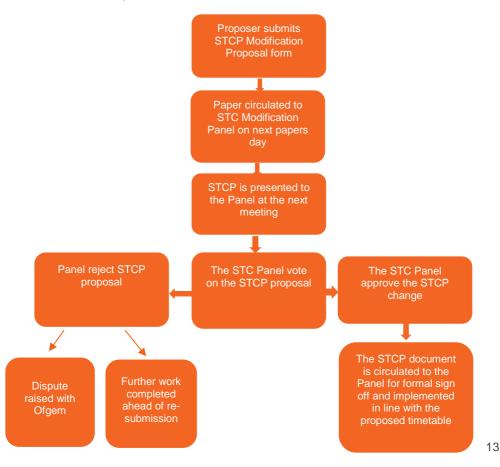


#### STC Procedure (STCP) process

The STC procedures (STCPs) set out the roles, responsibilities, obligations and rights of each party to fulfil their STC obligations in further detail.

A Party can raise a change to a STCP if they wish to, these changes can be both housekeeping or material changes. The parties work collaboratively to agree the amendments, in the rare case that this is not agreed a dispute can be raised with the Authority (Ofgem)

These modifications are numbered starting PM (Procedure Modification)





#### The Code Administrator: Contact details

You can contact us by either emailing the respective. Box which can be located below or alternatively, if you wish to talk to us on the phone please give the Panel Secretary a call anytime.

Grid Code: Grid.code@nationalgrid.com

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On our website you can find information on all of the modifications across our codes, horizon scanning, FAQs, our new modification tracker and more. https://www.nationalgrideso.com/codes



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