

Guidance Note:

National Grid ESO Code Administrators Critical Friend Role on Modifications

Introduction

This document sets out the process that we, National Grid Electricity System Operator (ESO) Code Administrator, will undertake upon submission of a new modification to fulfil our role as critical friend to the industry. It sets out the actions that we will take upon submission of new modification proposals, how we will demonstrate transparency in the process, the feedback we will share with industry and Panels to demonstrate improvements and it shows the timetable for new modification proposals to be submitted.

Critical Friend Role

The Code Administrator Code of Practice (CACoP) was established following Ofgem's Code Governance Review in 2010. The purpose of CACoP is to facilitate best practice and transparency in the code modification processes also helping protect the interests of small market participants and consumers through the adoption of key code administration principles. The first principle is 'Code Administrators shall be critical friends'. The introduction of an extended review period ahead of modification submissions is enabling us to act as a Critical Friend. The 14 CACoP principles are available on Ofgem's website¹.

New Modification Submission Process

Following submission of a new modification proposal there is a five-working day review period where we will liaise with proposers to ensure the modification is fit for purpose prior to its submission to Panel. New modifications are then shared with industry 5 working days before Panel is held. The intention of introducing this additional time is to raise the quality of modifications being submitted to Panel by ensuring the use of plain English, no jargon, expanded acronyms, clear titles – demonstrating the intent of the modification, and an articulated defect. Please see Annex 1 for a list of checks that we will carry out for each Modification proposal.

The critical friend review of modifications proposals adds time at the start of the process, however this ensures modifications are set up 'for success', meaning less time should be spent in the subsequent stage gates of the modification process.

Transparency

Whilst industry and Panel supported the implementation of the additional five-day period for the critical friend review, to ensure transparency in the process we have committed to:

- Circulating a draft agenda to the industry with the modification number and title by way of email notification and uploading the draft agenda to the National Grid ESO Code Administrator website on 9 working days before Panel is held; and

¹ <https://www.ofgem.gov.uk/licences-industry-codes-and-standards/industry-code-governance/code-administration-code-practice-cacop>

- Sending all new modification proposal forms to the independent Panel Chair of the respective Panel. Note that the National Grid ESO Code Administrator will forward on the emails they received from the Proposer to ensure is a clear date and time stamp of when the new modification proposal form was received.

Feedback to Panel and Industry on Improvements

By way of ensuring the implementation of the additional five working days is achieving its intent, and improving quality of new modification proposals, we will provide feedback to the industry and to Panel. We have committed to:

- As part of the discussion on each new modification proposal presented at Panel, summarising the feedback given to the Proposer and which of the proposed revisions have been made to modification proposal forms; and
- On a quarterly basis (October, January, April and July), provide a spreadsheet in the Panel pack (which will also be available on the National Grid ESO Code Administrator website) summarising this feedback given to the Proposer and which of the proposed revisions have been made to modification proposal forms.

The modification proposal form will be incremented in version control between any changes and all previous iterations to those published on panel papers day will be retained by us.

Impacted Parties

The modification proposal form identifies which parties are impacted either in terms of a low, medium or high impact within the industry. The five-working day period for review will include us supporting the proposer to identify impacted parties that have not already been recognised, and to draw out any consumer impacts. It should be noted that within the development of the modification this may evolve.

Guidance

Acting as a critical friend we are aiming for new modification proposals to be the best they can be for the proposer, industry, Panels and the Authority. It is our ambition that by spending the additional time upfront of the submission we may save time within further stages i.e. the workgroup. However, all recommendations are suggested for guidance only. The proposer of a modification is not obligated to update their proposal form based on advice given to them.

Timetable for submission in 2019

The following three tables outline the submission dates for new modification proposals to the Connection and Use of System Code (CUSC), the System Operator Transmission Owner Code (STC) and the Grid Code. We will publish these dates on our Events Calendar².

CUSC

Month	New Modification Proposal Submission Date	Panel Papers Date – publication to industry	Panel Date
August	14 August	21 August	30 August
September	12 September	19 September	27 September
October	10 October	17 October	25 October
November	14 November	21 November	29 November
December	28 November*	5 December*	13 December*

² <https://www.nationalgrideso.com/codes/meetings-events>

Grid Code

Month	New Modification Proposal Submission Date	Panel Papers Date – publication to industry	Panel Date
August	13 August	20 August	29 August
September	11 September	18 September	26 September
October	14 October**	21 October**	29 October**
November	13 November	20 November	28 November
December	4 December*	11 December*	19 December*

STC

Month	New Modification Proposal Submission Date	Panel Papers Date – publication to industry	Panel Date
August	12 August	19 August	28 August
September	10 September	17 September	25 September
October	15 October	22 October	30 October
November	12 November	19 November	27 November
December	3 December*	10 December*	18 December*

* December dates are early to factor in Christmas

** Amended October Grid Code Panel date

If you have any questions on this, please do not hesitate to contact us via box.codes.mce@nationalgrideso.com

Annex 1

The following represents the nature of the checks that the Code Administrator will carry out for each Modification Proposal:

- Is the Modification Proposal in plain English and are all acronyms defined?
- Is the defect that is trying to be addressed clearly articulated?
- Is the proposal clear on which parties are impacted and how they are impacted (where possible this should be broken down into which types of specific user is impacted i.e. rather than just saying 'generators' what sizes and types of generators are impacted?)
- Is the proposal clear on which other codes could be impacted and how they could be impacted?
- Is the proposal clear on the benefits of this Modification (benefits to articulate include compliance, consumer, environmental, technical)?
- Is the proposed timing of implementation clearly articulated?
- Are the unknowns clearly set out?