## **Grid Code Development Forum**

12 September 2019

### **Agenda**

1. Introductions

2. Presentation: Proposal to change Connection Condition CC.6.5 (Peter Dennis, Ecotricity)

3. Code Administrator Update (Paul Mullen, National Grid ESO)

4. Any other business

5. Close

# Proposal to change CC.6.5

Communications Plant with regards to small or aggregated units as part of Wider Access to the Balancing Market





# Background

- Wider Access to the Balancing Market is scheduled to go live in Dec 2019.
- This will allow participation of aggregated units being managed by Virtual Lead Parties (VLPs) with Secondary Balancing Market Units (BMUs) or Suppliers under Additional BMUs. (CMP295, P344 and GC0097 are related)
- Rather than the traditional Electronic Data Transfer/Electronic Data Logging (EDT/EDL) method of communication, participants will be able to use a Web based Application Programming Interface (API) to submit bids and receive instructions.
- This has the potential to bring numerous new units into the Balancing Market (BM) allowing a greater level of control for the Electricity System Operator (ESO) that they otherwise would not have.





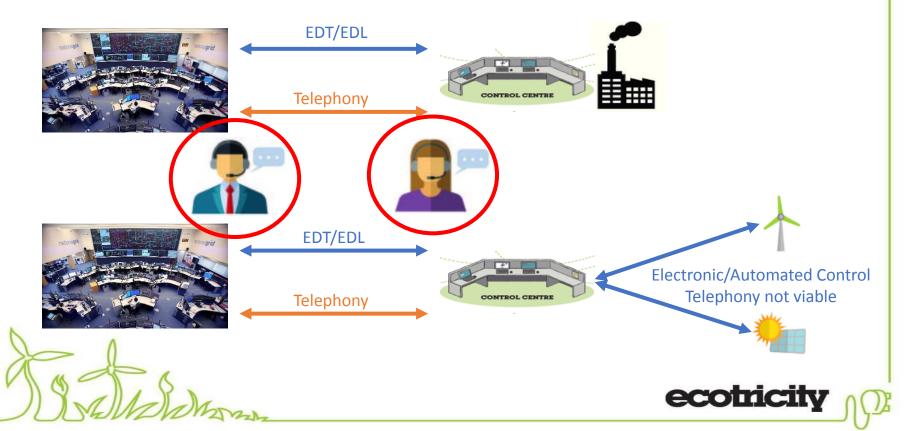
### Defect

- Grid Code CC.6.5 stipulates the communication requirements between a control point in the BM and the ESO control room.
- The requirements around control/system telephony being operated 24/7 are a sensible precaution with regards to large power stations but could be considered onerous and impractical when applied to small aggregators.
- Small aggregators have limited resource and the material impact on the ESO is also very low. Manually phoning plant of ~5MW is inefficient.
- The function of telephony as a back up is incomplete in aggregated systems





# System Architecture – why VPPs are different



#### Concerns

- Back up Control Telephony continues to work in a power cut, what back up options are there without it?
- Growth Aggregators may be small and immaterial now, but how do we futureproof any changes for when they are a substantial part of balancing
- Level playing field + arbitrary segregation Need to avoid disadvantaging other parties or creating distortions through arbitrary boundaries.





### Benefits

- Greater visibility and control of the network for the ESO, therefore greater security
- Opportunity to replace manual telephony with automation.
- Increase in automation will bring efficiency and reduce costs to consumers.
- Wider Access is the perfect opportunity to test and trial automation on units that will not have a material impact if the communications fail.





# **Options**

No change – Wider Access to BM less successful if barriers remain.
 Large volume of small distributed flexibility remains outside of ESO control. Telephony that is implemented is under-utilised to justify its cost.

2. No telephony required for wider access participants – increase in flexibility under ESO control, but control limited to automated processes. No back up, acceptable at first but aggregation eventually becomes material.





# **Options**

**3.** Contract out of hours phone operation – Use system telephony during office hours, 3<sup>rd</sup> party has direct control of portfolio out of hours. Contractually more complex. Threat to competition with larger parties providing the 'keys' to BM.

**4. Set a materiality threshold for telephony** – e.g. sub 50MWs will help small aggregators become established before being required. Creates an arbitrary boundary within participants that may cause distortions or sub-optimal behaviour.





# Summary

- ESO control room stands to gain from Wider Access.
- Aggregated assets are different to traditional power stations and should be treated differently.
- Telephony to the VPP control point only covers part of the communication chain.
- Small units up to 100MW and as low as 1MW have limited impact on the network individually so there is little need to provide a back up and it's not efficient for the ESO to phone small units in an emergency.
- Provides an opportunity to develop robust automation at a small scale without presenting a risk to the grid.





### Code Administrator Update

Paul Mullen
National Grid ESO



national**gridESO** 

### **Authority Decisions**

No Authority decisions have been made since last month.

#### **New Modifications**

There was **one new modification** discussed in August:

GC0130 – OC2 Change for simplifying 'output useable' data submission and utilising REMIT data Modification category: Non-urgent

Panel agreed to proceed via the self-governance route with a Workgroup.

In Flight Modification Updates



#### **Dashboard – Grid Code (August)**

Category	Jul	Aug	Sep	Oct	Nov	Dec
New Modifications	0	<b>1</b> (GC0130)				
In-flight Modifications*	14	13**				
Modifications issued for workgroup consultation	2	0				
Modifications issued for Code Administrator Consultation	0	0				
Workgroups held	5	3				
Authority Decisions	0	0				
Implementations	0	1				
Modifications on Hold	3	3				
Workgroups postponed due to quoracy issues	1	0				

<sup>\*</sup> Includes those on hold

<sup>\*\*</sup> GC0127/GC0128 now treated as 1 Modification

**Modifications with Workgroups (in Prioritisation Order)** 

Re	f.	Latest	Next Workgroup Meeting(s)
	0127/ 0128	Workgroup consultation issued 19 July (closed 16 August). Workgroup meetings 22 and 28 August to discuss responses and finalise workgroup report and carry out workgroup vote. Final Workgroup Report sent to Panel 3 September 2019 in readiness for Special Panel on 10 September to seek approval of Workgroup Report. Special Panel set up for 14 October to seek approval of Draft Final Modification Report.  Note that July Panel also agreed to treat GC127 and GC128 as 1 Modification.	n/a
GC	0096	Timeline to be agreed post workgroup meeting on 12 September (note that original workgroup report was signed off at April 2019 Panel; however when DFMR was presented at June 2019 Panel, Panel decided to send back to workgroup). Revised legal text and workgroup report have been circulated with comments requested by 4 September.	12/9/19
GC	0130	Presented at August Panel. Panel determined that this would be e self governance with a workgroup. Request for workgroup nominations sent out 3 September 2019.	1/10/19
GC0109		Noted at July Panel that we cannot now meet agreed timetable (workgroup report to August Panel) - delay to issue of workgroup consultation due to volume of comments. Call on 18 September 2019 with workgroup members who have provided the bulk of the comments with a view to then holding a workgroup meeting in October 2019 at which revised timeline will be agreed.	TBC (October)

#### **Modifications with Workgroups (in Prioritisation Order)**

Ref.	Latest	Next Workgroup Meeting(s)
GC0107/ GC0113	Revised timeline agreed at July Panel. Workgroup Consultation closes 6 September 2019 and meeting to discuss consultation responses set up for 13 September 2019. Workgroup Report to be presented to October Panel.	13/9/19
GC0117	Workgroup Report to Panel originally due 30 July 2019. However as agreed at Panel 30 May 2019, dates to be confirmed following next workgroup (originally 10 July 2019).	TBC (November?)
GC0105	Noted at July Panel that we cannot now meet agreed timetable (workgroup report to August Panel) due to quoracy issues. Timeline to be agreed at next workgroup meeting on 16 September 2019 to bottom out any final issues and aim to proceed to vote as soon as possible.	16/9/19
GC0103	Agreed at Panel 30 May 2019 for timeline to be agreed at next workgroup meeting (date to be agreed - will be November at earliest). Agreed at July Panel to move down the prioritisation stack.	TBC (November?)
GC0126	Agreed at Panel 30 May to continue to seek workgroup members. Still not quorate - we will be seeking Panel approval to agree to send straight to Code Administrator Consultation (legal text was circulated on 13 August 2019 for comment by 20 August 2019 and in light of comments received, ESO need to review and instead propose at September Panel for this Modification to go straight to Code Admin Consultation)	n/a

#### **Modifications post Workgroup (in Modification Number Order)**

Ref.	Latest
GC0121	Implementation was expected 24 April 2019 – however due to uncertainty on Brexit, it was agreed at 25 April 2019 Panel that once Draft Final Modification Report is published it must go to the next Panel meeting for vote. Therefore, it is intended that the modification be put on hold until such time as it may be required to progress. Special Panel set up for 1 November 2019 to approve Draft Final Modification Report.
GC0123	Implemented on 4 September 2019.
GC0124	Implemented 1 August 2019 - Guidance Note published by Code Administrator 27 June 2019 and republished 1 August 2019.
GC0125	Workgroup consultation closed 12 July. Workgroup vote held 7 August 2019. August Panel approved workgroup report and confirmed that this can now be sent for Code Administrator Consultation. Special Panel set up for 14 October to seek approval of Draft Final Modification Report.
GC0129	Agreed at Panel 30 May 2019 for this to proceed to code administrator consultation (proposed to be 9 September 2019, closing 30 September 2019) once the G5/5 document is finalised. D Code Mod is being proposed to be presented at DCRP on 6 October with a view to being presented to Authority thereafter. Panel to note proposal to include presentation of Draft Final Modification Report as part of agenda for Special Panel on 14 October 2019.



#### **New Timeline**

#### **Current Timeline**

Panel Papers to Industry (D-5)



Panel (D)

#### Timeline from 1 August 2019

New Modification Proposal Submission Date (D-10) Circulate draft agenda to industry and all new modification proposals\* to Panel Chair (D-9)



Panel Papers to Industry (D-5)



Panel (D)

<sup>\*</sup>This will be the email that the Proposer sent to the Code Administrator

#### Note the new dates

	September	October	November	December
GCDF*	12/9/19	10/10/19	7/11/19	12/12/19
New Modification Proposal Submission Date	11/9/19	14/10/19	13/11/19	4/12/19
Papers Day	18/9/19	21/10/19	20/11/19	11/12/19
Grid Code Review Panel	26/9/19	29/10/19	28/11/19	19/12/19

<sup>\*</sup>Reviewing GCDF (and TCMF) dates in light of implementation of Critical Friend Modifications on 1 August 2019

### **Next Meeting**

The next meeting will take place on **10 October 2019** at Faraday House, Warwick and via Webex.

Please contact us at <a href="mailto:Grid.Code@nationalgrideso.com">Grid.Code@nationalgrideso.com</a> if you wish raise an agenda item to be discussed at the Grid Code Development Forum.

