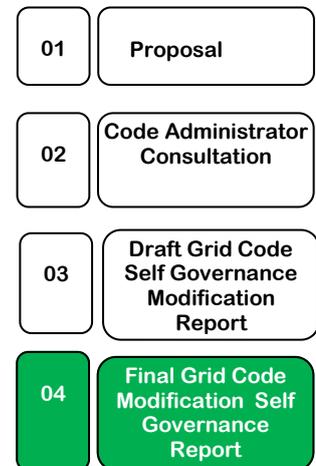


GC0136

Mod Title: Non-material changes to the Grid Code following implementation of the EU Connection Codes.



Purpose of Modification: To implement a number of non-material amendments to various sections of the Grid Code, in particular, to correct errors which were identified following the implementation of previous Grid Code Modifications GC0100, GC0101, GC0102 and GC0104. These Modifications were introduced following the implementation of the European Connection Network Code (i.e. Requirements for Generators (RfG), HVDC and Demand Connection (DCC) codes).



This Final Grid Code Self Governance Modification Report has been prepared in accordance with the terms of the Grid Code. An electronic version of this document and all other GC0136 related documentation can be found on the ESO website via the following link:

<https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0136-non-material-changes-grid-code>

At the Grid Code Review Panel meeting on 28 May 2020, the Panel voted on GC0136 against the Applicable Grid Code Objectives. The Panel members unanimously agreed that the Original was better than the baseline and determined that it should be implemented.



Low Impact All Users – correction to errors in Grid Code and provides clarification.

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		 Any questions? Contact: Nisar Ahmed Code Administrator  Nisar.ahmed@nationalgrideso.com  07773043068 Proposer: Antony Johnson  antony.johnson@nationalgrideso.com  07966 734856 National Grid ESO Representative: Phil Smith  Philip.smith4@nationalgrideso.com  07779 560 468

Timetable

The Code Administrator recommends the following timetable:	
Changes approved at Panel	26 March 2020
Code Administrator Consultation period (15 workings days)	21 April 2020 – 13 May 2020
Draft Self Governance Report issued to the Grid Code Review Panel	19 May 2020
Draft Self Governance Report presented to the Grid Code Review Panel	28 May 2020
Grid Code Review Panel decision	28 May 2020
Issue to Panel to confirm votes held at Panel (5 working days)	29 May 2020 – 05 June 2020
Appeal window (15 working days)	12 June 2020 – 02 July 2020
Decision implemented in Grid Code	03 July 2020

1 About this document

This document is the Final Grid Code Self Governance Modification Report that contains the details of the proposed corrections to the Grid Code with the aim of improving the quality of the text for all stakeholders.

GC0136 was proposed by National Grid ESO and was submitted to the Grid Code Review Panel for its consideration on 19 December 2019. The Panel decided that the Proposal met the criteria for Self-Governance as the changes were non-material.

The Self-Governance criteria used by the Panel to make the decision were as follows:-

Self-Governance - The modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- i) Existing or future electricity customers;*
- ii) Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity*
- iii) The operation of the National Electricity Transmission System*
- iv) Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies*
- v) The Grid Code's governance procedures or the Grid Code's modification procedures*

However, the Panel on 19 December 2019 could not determine whether or not this should proceed straight to Code Administrator Consultation.

Specifically, the Panel requested that:

- the non-material changes should be clearly identified and should be separated from the typographical changes. The Proposer has provided two documents which can be found in Annex 2 and Annex 3 which detail all the changes; and the proposed changes to the legal text need to be reviewed by a group of stakeholders and industry experts.

Following completion of both of these tasks, Panel on 26 March 2020 agreed that GC0136 should proceed to Code Administrator Consultation.

Code Administrator Consultation Responses

One response was received to the Code Administrator Consultation. A summary of the response can be found in Section 10 of this document. The respondent agreed that the proposal better facilitates the applicable Grid Code objectives, but they did note a couple of typographical errors relating to the introduction of Electricity Storage modules. This latter issue however has been resolved by Ofgem's approval of GC0096 (Electricity Storage) which was implemented into the Grid Code on 4 June 2020.

This Draft Grid Code Self Governance Modification Report has been prepared in accordance with the terms of the Grid Code. An electronic copy of can be found on the National Grid ESO website <https://www.nationalgrideso.com/industry->

[information/codes/grid-code-old/modifications/gc0136-non-material-changes-grid-code](https://www.gov.uk/government/consultations/information/codes/grid-code-old/modifications/gc0136-non-material-changes-grid-code) along with the Modification proposal form.

2 Original Proposal

Section 2 (Original Proposal) is sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported.

Defect

In 2018, the GB Grid Code was updated (through Grid Code modifications GC0100, GC0101, GC0102 and GC0104) to implement the European Connection Network Codes (ie Requirements for Generators (RfG), HVDC Code and the Demand Connection Code (DCC))

Shortly after the requirements of RfG and HVDC Codes were implemented into the GB Grid Code, it was realised that the effective date from when the RfG and HVDC Codes applied was incorrect, together with a number of other minor errors. It was initially proposed to address all these issues at the same time, however the implementation dates were first corrected via Grid Code modification GC0116 and the later non-material changes were agreed to be amended at some future point which has resulted in this Grid Code Modification (GC0136).

As part of this modification, the opportunity is being taken to correct a number of other outstanding errors which have been observed in checking the current Grid Code legal text.

What

This modification seeks to correct these errors in the relevant sections of the Grid Code.

Why

This will provide clarity to users, remove known errors and improve the quality of the Grid Code.

How

It is proposed to modify the Grid Code to correct the identified errors. Please see the Legal Text Section for a summary of the proposed changes, and the attached Legal Text for those sections in full detail.

3 Proposer's Solution

Section 3 (Proposer's Solution) is sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported.

Correcting the typographical and other non-material errors will address the defect.

Please see a high-level summary of the changes in Annex 2 and updates to the Legal Text in Annex 1 of this consultation.

4 Impacts & Other Considerations

Shortly after the requirements of RfG and HVDC Codes were implemented into the GB Grid Code, it was realised that the effective date from when the RfG and HVDC Codes applied was incorrect, together with a number of other minor errors. It was initially proposed to address all these issues at the same time, however the implementation dates were first corrected via Grid Code modification GC0116 and the later non-material changes were agreed to be amended at some future point which has resulted in this Grid Code Modification (GC0136).

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This modification is not expected to impact any SCR's or other significant industry change projects or other Consumers directly.

Consumer Impacts

This modification is not expected to impact Consumers directly.

5 Relevant Objectives

This section outlines the Proposer's view of how this modification meets the Applicable Grid Code Objectives.

Impact of the modification on the Applicable Grid Code Objectives:

Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Positive
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Positive
(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Positive

(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	Positive
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive

This modification makes a number of changes across multiple areas of the Grid Code. Whilst the individual changes are not material, together they will make a significant improvement to the grid code, by removing errors, improving accuracy and making the text clearer and easier to understand for users. This has a positive impact on all the Grid Code objectives.

6 Implementation

This modification needs to be implemented before GC0132 “Updating the Grid Code governance process to ensure we capture EBGL change process for Article 18 Terms and Conditions (T&Cs)” is implemented.

- GC0136 makes changes throughout the Grid Code but it is essential to the intent of this modification that none of these are material. The Panel’s decision on Self-Governance was made on this basis.
- GC0132 puts in place an amended modification process to align with the requirements of Article 18 of the Regulation [\(EU\) 2017/2195](#) establishing a guideline on electricity balancing (EBGL). The requirement to follow this process in compliance with EBGL is for changes that are made to the Balancing Terms and Conditions which were defined through a mapping carried out to the GB Frameworks. As none of the changes in GC0136 are material, these do not make substantive changes to the terms and conditions and are therefore not required to comply with the process set out in EBGL and will be applied to the Grid Code through GC0132.

This modification will be implemented into the Grid Code on 3 July 2020.

7 Code Administrator Consultation Response Summary

The Code Administrator Consultation was issued on 21 April 2020 for 15 working days with a closing date of 13 May 2020.

One response was received (National Grid ESO) in response to the Code Administrator Consultation and this can be found in Annex 1 of this report.

On whether or not the Original best met the Grid Objectives:

The respondent agreed that GC0136 better facilitates all five applicable Grid Code Objectives by removing errors, improving accuracy and making the text clearer and easier to understand for Users. Whilst none of the individual changes are material, there are numerous non-material changes being proposed, and together they will make a significant improvement to the accuracy and clarity of the Grid Code as a whole.

On Implementation:

The respondent recommend that this is implemented sooner rather than later. It impacts many areas of the Grid Code, so it is advisable to implement these changes as soon as possible, to avoid any unnecessary confusion between different versions of the code.

Since they are so widespread, care will need to be taken in implementing these changes. Panel should ask the Code Administrator to ensure that the changes are made to the baseline at the time that the mod is approved and thereafter that care is also taken to apply the changes from any modification that is in progress to the baseline as corrected through GC0136.

8 Panel Views

At the Grid Code Review Panel meeting on 28 May 2020, the Panel voted on GC0136 against the Applicable Grid Code Objectives. The Panel members unanimously agreed that the Original was better than the baseline and determined that it should be implemented.

For reference the Applicable Grid Code Objectives are:

- (a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- (b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);*
- (c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;*
- (d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and*
- (e) To promote efficiency in the implementation and administration of the Grid Code arrangements.*

Vote 1: Does the Original facilitate the objectives better than the Baseline

Panel Member: **Alan Creighton**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
	Voting Statement					
The Modification resolve a significant number of non-material issues making the Grid Code easier to read and understand.						

Panel Member: **Alastair Frew**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Neutral	Yes
	Voting Statement					
This is a housing keeping modification which does not change any requirements or obligations on any party and it only tidying up the text.						

Panel Member: **Christopher Smith**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
	Voting Statement					
The minor modifications help reduce potential confusion in the codes.						

Panel Member: **Damian Jackman**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)

Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
	Voting Statement					
The corrections made improve the clarity of the Grid code.						

Panel Member: **Guy Nicholson (Not present for the Vote)**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original						
	Voting Statement					

Panel Member: **Joseph Underwood**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Yes	Yes	Yes
	Voting Statement					
GC0136 will facilitate the implementation of some EU codes.						

Panel Member: **Rob Wilson**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
	Voting Statement					
This long-overdue modification makes minor changes to all sections of the Grid Code and, while none of these are significant, it improves the clarity of the code and provides a better baseline for other changes to be made.						

Panel Member: **Robert Longden**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Yes	Yes	Yes

Voting Statement						
The modification represents a "correction" of certain errors/anomalies in the Grid Code. As has been noted it covers a wide number of areas and has a potential impact on several modifications. Therefore, a clear focus on concise implementation and recognition of interactions is required following approval.						

Panel Member: **Richard Woodward** (Alternate to Ross McGhin)

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes

Voting Statement						
This modification removes any risk of ambiguity or misunderstanding of important Grid Code obligations established by implementing the requirements of EU regulations.						

Panel Member: **Graeme Vincent** (Alternate to Steve Cox)

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes

Voting Statement						
The proposed modifications corrects a number of errors and improves accuracy with the code drafting across the full range of the constituent codes which make up the Grid Code and therefore should improve understanding of requirements by Users.						

Vote 2 – Which option is the best?

Panel Member	BEST Option?
Alan Creighton	Original
Alastair Frew	Original
Christopher Smith	Original
Damian Jackman	Original
Guy Nicholson	Not present for vote
Joe Underwood	Original
Rob Wilson	Original

Robert Longden	Original
Richard Woodward (Alternate to Ross McGhin)	Original
Graeme Vincent (Alternate to Steve Cox)	Original

9 Legal Text

The proposed legal text for GC0136 is set out in Annex 1 of this document.

10 Impacts

Industry costs	
Resource costs	£2,723 – 1 Consultation <ul style="list-style-type: none"> • 0 Workgroup meetings • 0 Workgroup members • 1.5 man days effort per consultation response • 1 consultation respondent
Total Industry Costs	£2,723

Annex 1: GC0136 Legal Text

The proposed legal text for GC0136 can be found on the National Grid ESO website [here](#).

Annex 2: Table of changes: Issues identified with new baseline

This document lists the non-material amendments proposed as a result of conducting a thorough review of the baseline in relation to the implementation of respective modifications.

Annex 3: List of queries discussed with Group

This document details the queries and Proposer's responses on the GC0136 proposed legal text which were discussed with the group of stakeholders involved in this modification.

Annex 4: Self Governance Statement GC0136

This is the Self-Governance statement issued to Ofgem.

Annex 5: Code Administrator Consultation Responses

Attachment of the Code Administrator Consultation response received.