

Special Grid Code Review Panel GC0143

Minutes: 06 May 2020

Grid Code Review Panel Minutes

Date: 06/05/2020 **Location:** WebEx Only
Start: 13:00pm **End:** 14:00pm

Participants

Attendee	Initials	Company
Trisha McAuley	TM	Independent Panel Chair
Chrissie Brown	CB	Code Administrator Representative
Kirsten Shilling	KS	Panel Secretary (Code Administrator)
Nisar Ahmed	NA	Code Administrator Observer
Alan Creighton	AC	Panel Member, Network Operator Representative
Alastair Frew	AF	Panel Member, Generator Representative
Christopher Smith	CS	Panel Member, Offshore Transmission Operator Representative
Damian Jackman	DJ	Panel Member, Generator Representative
Steve Cox	SC	Panel Member, Network Operator Representative
Gurpal Singh	GS	Authority Representative
Guy Nicholson	GN	Panel Member, Generator Representative
Jeremy Caplin	JC	BSC Panel Representative
Joseph Underwood	JU	Panel Member, Generator Representative
Richard Woodward	RWO	Alternate, Onshore Transmission Operator Representative

Rob Wilson	RWI	National Grid ESO Panel Member
Robert Longden	RL	Panel Member, Supplier Representative

1. Introductions and Apologies

7860. TM opened the Grid Code Review Panel meeting with an introduction and overview of the agenda.
7861. TM also thanked members for attending this special Panel meeting, in order to carry out the recommendation vote for the urgent modification [GC0143](#).

2. Code Administrator Consultation summary

7862. CB provided a brief background of the modification and the urgency request. CB noted that for ease of analysis, the responses to the consultation had been summarised into themes. There were 67 responses which had been shared with members, ahead of this meeting.
7863. The themes fell into; Environmental, Implementation & Transparency, Compensation and level playing field, Asset Impact & restarting, Time taken to raise the change, Working with the ESO & new product (Optional Downward Flexibility Management – ODFM) and Ongoing Grid Code Modifications.
7864. CB noted that most respondents stated that they understood the reasoning behind the modification being raised and the threat to Security of Supply that the current situation (COVID-19) poses for the GB National Electricity Transmission System (NETS).
7865. Whilst there was broad understanding of the issue facing National Grid ESO there was a range of concerns raised around the approach outlined in this modification. Questions were also raised around the approach through urgency and whether there would be unintended consequences to the modification being implemented as a result.

3. Panel Discussions

7866. TM noted that it would be appropriate for RWI to discuss the draft letter to industry, to be sent as soon as possible, that the ESO had constructed to industry (shared within the slides to Panel).
7867. RWI talked through the ESO letter to industry (also to be published on the website) and explained that the reason it was important to publish this, was to address the concerns raised through the consultation responses and how it was planned to address these.
7868. RWI noted that the letter would also make it clear that an emergency instruction would only be used as a last resort once all commercial alternatives had been exhausted. Also, to note that work to develop an enduring solution to replace that in GC0143 would commence imminently bearing in mind that the GC0143 solution times out on 25 Oct 2020.
7869. RWI also noted that it would be important to state in the letter that the urgent mod would not seek to establish anything new (given that the right for the ESO to give emergency

instructions (EIs) to the DNOs to disconnect plant and apparatus already exists in the Grid Code) but to provide legal clarity to all parties should there be a need to employ emergency instructions. Further to this, to reiterate that EIs would only be used as a last resort measure to avoid worse disruption to consumers.

7870. The Panel were invited to comment and provide feedback.
7871. RL noted that it would be important to ensure that the tone of the letter ensured that no party felt singled out and that this would apply to all.
7872. SC noted that the letter needed to emphasise that this modification would not seek to do anything new but to clarify already existing text within the Grid Code.
7873. SC noted that he felt that a lot of the response themes were around the notion that this modification was creating a new process and felt that by providing reassurance in the ESO letter that this was simply a change to instruction format and for clarification, it would alleviate most of these concerns.
7874. DJ noted that one concern was that there might not be enough detail in this consultation to give examples of how this would be implemented, and which generators would be chosen for disconnection and what criteria would be used for disconnection.
7875. SC noted that this was not within the scope of this specific urgent modification and the purpose of this was only to change instruction format in the event of a last resort measure.
7876. RL noted that this was fair but that it would be essential to involve stakeholders later in the process should another modification be raised to discuss the other elements noted that were out of scope for this urgent modification. Stakeholders need to be engaged to prevent negative public relations (PR) for the industry.
7877. All. It was noted that many of the concerns raised were around existing text within the Grid Code, rather than issues with the change to instruction format that this modification proposes.
7878. JC noted that placing a sunset clause on a modification that was only clarifying the existing code could cause confusion.
7879. JU stated that clarity was needed by stakeholders in terms of the foot-room issue. He felt that it may be discriminatory for solar farms to get disconnected.
7880. SC stated that it was the responsibility of the site operator to be able to deal with the consequences of a loss of connection and that no new powers would be introduced through this modification. Similarly, landfill gas sites, for example, could be disconnected if there is a demand issue and it would be the landfill site operators' responsibility to deal with this. This would not be a new risk for generators but it would be incumbent on the ESO and the DNO networks to communicate with the generators.
7881. RWI explained that this modification felt like the most sensible approach given demand is higher in winter and therefore EIs would not be used. RWI also noted that he would ensure that the sunset clause would be explained more in the letter. It was important to include the sunset clause as there was not enough time to follow normal procedures and the intention is to look at the arrangements again through the development of an enduring solution.
7882. RWO noted that the environmental responses were addressing issues outside the scope of this modification. He also raised the question about whether or not there is a gap over

the winter period which would present a risk for the ESO and if so, could the sunset clause be changed using the governance process.

7883. RWI stated that after expiry of the sunset clause EI's would not be needed until Spring 2021.
7884. **NEW ACTION** RWI noted these points and took the action to ensure all these issues were explained clearly in the letter to Industry to be published on the ESO website and that they would be picked up as part of the enduring solution.
7885. RL commented that if rarely running generation was disconnected then that would be more acceptable than if pre-selected generation was disconnected as this would raise more concerns from Industry.
7886. GN noted that potentially the defect could have made it clearer that this was only to change the emergency instruction rather than address ongoing issues that have already been in existence around this particular part of the code.
7887. RWI respectfully disagreed with this stating that the defect was written in such a way as to make it possible for the ESO to control this kind of situation and mitigate consequences as a last resort measure by ensuring clarity and therefore making it more likely that any EI would be correctly followed.
7888. GS stated that the modification was noted as having no impact on the applicable Grid Code Objective (e): To promote efficiency in the implementation and administration of the Grid Code arrangements. He suggested that this should be positive as the modification was to provide clarity on the instructions being issued.
7889. RWI agreed with GS and agreed to change. However, RWI stated that the primary focus of the modification was security of supply.

4. Next steps

7890. CB noted that the ESO would take all points above to ensure that the letter to Industry was clear and addressed the concerns.
7891. CB also noted that the FMR would include clarity on the fact that this was only a change to emergency instruction format rather than anything new and that the ESO would take all possible endeavours to mitigate the use of emergency instructions so that they would be only last resort measure.
7892. GS also noted that it would be useful to demonstrate that it was also a positive indicator against Objective (e) within the FMR. CB noted to make this amend.

5. Vote

7893. CB explained how the vote would be conducted and invited all members to present their vote. The Panel members, by majority, recommended that the proposal was better than the baseline (what is currently code today) and that it should be implemented.
7894. CB noted that given the urgent nature of the mod, she would update the FMR to include the votes on the same day to send to the Authority. A decision from Authority would be made on the following day (Thursday 7 May 2020) as confirmed by GS.

6. Any Other Business (AOB) and Close

7895. TM thanked Panel members for voting and for carefully considering the responses.
7896. The Panel agreed on the importance of ensuring that the headline report fully reflected the extent of the Panel's serious consideration of the responses that had been provided.
7897. **NEW ACTION** The Chair took an action to ensure that the wording of the headline report reflected the extent of the Panel's consideration of the issues raised in the consultation.
7898. **NEW ACTION** All were in agreement that the fact that there were so many Industry responses to the CAC meant that more thought and reflection should be given to them at a future Panel, so the outputs of this could be shared later.
7899. TM thanked the Authority and CB for their work in ensuring that the urgent timescales were adhered to. TM also personally thanked CB for her help during her time within the Code Administration team.