

Special Grid Code Review Panel GC0143

Minutes: 01 May 2020

Grid Code Review Panel Minutes

Date: 01/05/2020 **Location:** WebEx Only
Start: 13:00pm **End:** 14:00pm

Participants

Attendee	Initials	Company
Trisha McAuley	TM	Independent Panel Chair
Nisar Ahmed	NA	Code Administrator Representative
Rob Pears	RP	Panel Secretary (Code Administrator)
Chrissie Brown	CB	Code Administrator GC0143 Representative
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

7818. TM opened the Grid Code Review Panel meeting with an introduction and overview of the agenda.
7819. TM thanked Panel members for attending this special Panel meeting at short notice and confirmed that the meeting needed to conclude by 14:00 to ensure that the urgent modification timeline could be met, so requiring the Panel to agree via a vote at 13:45 whether the Modification is deemed to have met Urgency criteria.
7820. NA confirmed to the Chair and the Panel that the meeting was quorate for the vote to be carried out.

2. Urgent Modification Process – Governance Rules (GR.23)

7821. NA talked the Panel through the process surrounding the criteria to be designated as an Urgent Modification and the Governance Rules that apply to the process, which are covered in GR.23 of the Governance Rules.
7822. TM questioned if the ESO had discussed the modification proposal with Ofgem.
7823. GS confirmed that Ofgem were sighted on the modification and informed the Panel that, if an urgency recommendation was made, Ofgem intended to make its decision later that day.
7824. CB confirmed that the urgency route would allow for deviation from the standard Governance Rules, and that the full timeline would be discussed shortly.

3. Possible Amendments to GC0143 Solution

7825. RWI took the Panel through two changes made to the solution as a result of feedback:
- An amendment to BC.2.9.4.1 to give further assurance that the ESO will exhaust all other options before taking any 'Emergency Action', this also being established in the requirement set out at the beginning of the 'Emergency Actions' section for the ESO to act reasonably which is shown in BC2.9.1.1.
 - An addition to the end of the new clause BC2.9.3.3(f) to state that an instruction from The Company to the Network Operator will be given to commence reconnection. This matches with the reconnection clauses in OC6 for demand control.
7826. RWI also confirmed that there is a sunset-clause in place which expires 25 October 2020 (clock change date).

4. Panel Discussion

7827. TM opened the topic for discussion and asked the Panel for the first question to be brought forward.
7828. JU asked where the text is stating that ESO can already do this.
7829. RWI directed JU to the proposal document and clause BC2.9.1.4 which states "In the case of a Network Operator or an Externally Interconnected System Operator, Emergency Instructions will be issued to its Control Centre."
7830. RL asked when has this power been used in the past and what the process was then (to be provided post meeting).

7831. RWI stated that he could not recall NGENSO having asked a DNO to disconnect an embedded generator in the past. *[As a post meeting clarification and to address the action in RL's point – instructions for general downwards regulation i.e. to resolve system imbalances have not been given but for localised issues often characterised by local NRAPMs this has been a relatively frequent occurrence to resolve capacity issues within a group or constraint boundary].*
7832. AF informed the Panel that in the past emergency instructions from the DNO coming from the TSO have previously been given to take embedded plant offline.
7833. RL stated that he hoped that the ESO would not be waiting till October when the sunset-clause comes in to play to look at the options that would be put in place and hoped that there would be industry involvement over the summer to assist the ESO in this process.
7834. RWI responded by clarifying that he completely agreed with the importance of looking at the enduring solution over the summer in a more considered time frame and that the ESO will require an enduring solution to be in place before spring 2021 and the next set of low demand periods. The ESO will ensure that industry is properly engaged and consulted in progressing this solution.
7835. DJ questioned why the legal text isn't clearer around the use of what is deemed to be reasonable and to ensure that all other actions have been exhausted prior to sending emergency instructions for disconnection.
7836. RWI accepted DJ's thoughts on the matter but clarified that the word 'reasonable' has already been used in the legal text and repeating it could cause confusion; this could also be addressed in the Code Administration Consultation response proforma.
7837. SC informed the Panel that it was very important that the text was clear so that instructions that are received by the DNOs are not ambiguous and that they are not open to multiple interpretations of what is reasonable as this could render DNOs liable to civil actions, which is why it is important that it is clearly outlined in the Grid Code.
7838. RWI considered that it is important that the ESO is expected to act reasonably and that this is set out in BC2.9.1.1 which covers any situation that can lead the ESO to issuing emergency instruction and what SC is saying is that what the ESO must not do is to have a 'reasonableness' test in the specific clause as that will reintroduce the legal ambiguity that the ESO is seeking to resolve whereby DNOs may feel that they do not have adequate protection, and is likely to lead to delays in taking necessary emergency action leading to possible wider disruption.
7839. GN informed the Panel that he was confused about the 'defect' in the proposal. He stated that his understanding is that currently the emergency instruction is not detailed clearly in the Grid Code, and therefore if the DNO follows such emergency instruction they may fall foul of some sort of civil action. He felt that if emergency instruction was necessary it was necessary, and if it was deemed after the fact that it wasn't, then a post-mortem should be carried out after the event rather than everything being set out in the Grid Code as the possibilities are endless in terms of what could happen.
7840. SC responded to GN by stating that the current Grid Code allows the ESO to request the disconnection of "an item of plant" i.e. a generator, and if you look at UK power networks you have 100,000 embedded generators, so appropriate emergency action is very difficult to achieve using the phrase 'a generator' which implies legally a named generator. So, as an example, in order to disconnect 1GW of embedded generation, if

that was the emergency instruction, the DNOs have to disconnect hundreds of generators and that could mean hundreds of instructions; the added clause allows the ESO to give an instruction for the total required capacity so the DNO will effectively implement this: that is the defect that is trying to be fixed.

- 7841. GN also informed the Panel of his concerns surrounding the sunset-clause which implies that it is removed in October and then if nothing else happens the issue will recur.
- 7842. RWI responded to the concerns around the sunset-clause; the easiest modification that could be used would be to remove this clause from the Grid Code but the ESO want to properly consult the industry and ensure that there is a solution that is more fully formed and has been properly engaged on with industry in a timely manner.
- 7843. JU queried if the ESO would be able to provide at a later date a detailed comms piece outlining all the effective steps that would be taken by the control centre prior to instructing the last resort emergency action.
- 7844. RWO stated that there is a role for the Panel, including specific members, to aid their industry counterparts to help the ESO by participating in ancillary services where they are not at the moment. This problem will persist into the summer and this modification is dealing with a worst-case scenario but there is an opportunity here for embedded generators to participate in services where they are not at the moment, either to the ESO or to their DNO, and which will make a last resort emergency instruction less likely to be required.
- 7845. **NEW ACTION** ESO to provide a detailed comms piece outlining all the steps taken prior to issuing an emergency instruction.
- 7846. JU queried if DNOs are able to complete this instruction, will it be automated and will certain plant such as hospitals be exempt from this?
- 7847. SC stated the DNO would have to comply with the Grid Code and they are happy that they can comply with the technical solution as proposed; clearly, they would not normally be required to disconnect whole substations or demand and, unless the ESO instructed specifically, would avoid essential services.
- 7848. JC informed the Panel that Elexon had been contacted by BSC parties that they are raising an emergency modification to the BSC around this change to ensure that additional imbalance charges are not incurred in relation to this Grid Code change.

5. Next steps

- 7849. TM asked CB to clarify to the Panel the governance responsibility for approving the GC0143 legal text.
- 7850. CB explained that it is the proposer's legal text but that, after the discussion just held, a form of a compromise and consensus has been reached in terms of agreement of the legal text.
- 7851. DJ stated that he would not agree that it was a consensus, more that it was a resigned acceptance.
- 7852. CB informed the Panel of the intended timelines subject to the Urgency status being approved. She stated that the timelines were due to it being a requirement for the modification to be implemented on Thursday 7 May in time for the bank holiday the following day.

7853. The Code Administrator Consultation would be open from Friday 1 May and close on Tuesday 2 May at 17:00.

6. Vote

7854. NA instructed the Panel how the vote would be conducted and invited all members to present their vote.

7855. The vote took place and the outcome was 9 'Yes' and 1 'No'; this concluded the vote and confirmed that this modification is recommended as urgent by a majority vote from the Panel members.

7856. CB noted that given the urgent nature of the modification, the formal Request for Urgency would be sent to the Authority that day and GS confirmed that the Authority also intended to make its decision be made later that day (Friday 1 May 2020).

7. Any Other Business (AOB) and Close

7857. TM thanked Panel members for voting and for the questions asked during the discussion.

7858. CB confirmed to the Panel that the next meeting to carry out the recommendation vote following the CAC responses would be held between 13:00-14:00 on Wednesday 6 May 2020.

7859. CB and TM thanked everyone for their participation today and their efforts to ensure that the urgent timescales could be adhered to.