

Grid Code Review Panel Minutes: 24 September 2020

Grid Code Review Panel Minutes

 Date:
 24/09/2020
 Location:
 WebEx Only

 Start:
 10:00am
 End:
 14:00pm

Participants

Attendee	Initials	Company
Trisha McAuley	TM	Independent Panel Chair
Nisar Ahmed	NA	Code Administrator Representative
Kavita Patel	KP	Panel Technical Secretary (Code Administrator)
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
Guy Nicholson	GN	Panel Member, Generator Representative
Gurpal Singh	GS	Authority Representative
Nadir Hafeez	NH	Authority Representative
Jeremy Caplin	JC	BSC Panel Representative
Joseph Underwood	JU	Panel Member, Generator Representative
Robert Longden	RL	Panel Member, Supplier Representative
Rob Wilson	RWi	Panel Member, National Grid ESO
Richard Woodward	RWo	Alternate, Onshore Transmission Operator Representative

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Bryan Rhodes BR	Alternate, Offshore Transmission Operator Observer
Sigrid Bolik SB	Alternate, Generator Observer
Matt Baller MB	Observer, National Grid ESO

Apologies

Attendee	Initials	Company
Ross McGhin	RM	Panel Member, Onshore Transmission Operator

1. Introductions and Apologies

8285. TM opened the Grid Code Review Panel meeting. Apologies were received from Ross McGhin.

2. Minutes from previous meeting

- 8286. TM advised Panel members that comments on minutes could only be accepted if the member concerned had been present at the Panel Meeting. Panel therefore did not approve the August minutes as this would create an undesirable precedent.
- 8287. This was a result of comments being submitted from AC who was not present in August and from TJ, who was present in August, being fed back via RWi.
- 8288. **NEW ACTION** NA to contact TJ and confirm that the comments RWi submitted were on his behalf for an audit trail. The minutes will then be circulated to Panel for offline approval.
- 8222. The Chair noted that, in his comments, AC had raised a valid point of wider industry interest under the horizon scan on the August minutes on 'Whole System Technical Code Digitalisation' which is a potential deliverable under the NGESO's RIIO T2 submission and could include both the Grid Code and Distribution Code, and may require creation of a whole system Technical Code as a preparatory step.
- 8289. **DECISION** TM agreed to address this point as AOB in this (September) Panel meeting and not in the August minutes due to AC not being present at the August Panel.
- 8290. TM advised Panel to liaise with NA on any changes to minutes prior to Panel meeting, and Panel should use latest iteration of the file to avoid multiple versions.
- 8291. JC asked NA if there was a possibility of having a collaborating tool for online versions of minutes and other materials rather than hard copies. RL added that having a collaborative tool will require user discipline.
- 8292. **NEW ACTION** NA to seek advice from NGESO IT (Information Systems) if Microsoft TEAMS can be utilised for collaboration with Panel members for Grid Code meeting documents or any other platforms.

3. Action Log

- 8293. The Panel reviewed the open actions from the meeting held on 27 August 2020. The actions log can be found here:
- 8294. On action 371, RWi asked Ofgem what progress had been made on approval of the various submissions made under the NCER as these lead to the requirement for GC0144 (Alignment of Market Suspension Rights to the EU Emergency and Restoration Code Article 35.1(b)).
- 8295. GS gave a background update on this and the need for GC0144. ESO submitted proposals under NCER (The Network Code on Emergency & Restoration) for market suspension. These provisions for market suspension, while based on current GB practices, need minor alignment with the Grid Code, hence the need for GC0144. There is a small risk of non-compliance with the Regulations if this modification is not prioritised. Ofgem have acknowledged the priority of this and are asking for it to be delivered quicker.
- 8296. **DECISION** Ofgem confirmed the importance of this modification and the need for the Code Administrator to progress this. Consequently, the Panel moved this modification higher in the prioritisation stack from position 12 to position 4.
- 8297. RWo & RL agreed to join this workgroup to make it quorate; the Code Administrator will ensure nomination forms are submitted to comply with the governance process.
- 8298. GC0109 (The open, transparent, non-discriminatory and timely publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc., issued by or to the Network Operator(s)). This modification has now had a robust plan agreed with the Code Administrator and the Proposer to recommence the workgroup in November. The Panel noted that the reason for this modification not progressing previously was that an action on the Proposer to review a draft of the workgroup consultation had been outstanding since October 2019. It was noted that to add information to BMRS (Balancing Mechanism Reporting System) could need a BSC (Balancing and Settlement Code) modification which would need to be identified by the workgroup.
- 8299. Action 358, RWo raised a concern over the lack of formal evidence of historic designations by Ofgem to allow the Onshore TOs to nominate themselves for applicable seats in the upcoming Panel elections. Ofgem have recently stated that any parties which have previously been designated in this way won't need to request this again (if they're not already listed as an applicable party in CUSC Section 1). RWo stated that obtaining evidence of this historic decision was important to reassure the Onshore TOs (or any others). He recommended that this should be dealt with outside Panel though.
- 8300. Discussions were had around the addition of Grid Code Objectives and consumer benefits criteria to the prioritisation stack template. Revising the objectives was deemed too complex and creating a plain-English version of the Objectives would risk changing their meaning, so has not been taken forward.
- 8301. **DECISION** The Panel closed all actions relating to the prioritisation stack, as this will be subject to ongoing review as a standing item on the agenda.
- 8302. Action 373 GC0142 (Adding Non-Standard Voltages to the Grid Code) Technical Guidance Note TGN288. RWi set out that for this, and other electrical standards owned

- by the TOs (Transmission Owners), while Panel could ask the TOs to amend these and Ofgem could request it, until Ofgem's approval of GC0142 the standards are not out of alignment with the Grid Code.
- 8303. Ofgem confirmed that they expect to provide a decision on the Final Modification Reports for GC0142 and the accompanying SQSS (Security and Quality if Supply Standard) modification in October/November 2020.
- 8304. Action 374 for Legal Text changes. Code Admin will now develop an audit trail log of Legal Text versions to add control.

4. Chair update

8305. TM updated the Panel on her meeting held with Mark Herring, Head of The Code Change Delivery Team, ESO. His intention is to attend a future Panel meeting.

5. Authority decisions

- 8306. GS updated Panel members, that the Authority decision on GC0133 (Timely informing of the GB NETS System State condition) was to direct the Grid Code Panel to revise the Final Modification Report so that further analysis in respect of objectives (a) and (c) are included, setting out:
 - 1. the benefits of the modification to market participants and stakeholders; and
 - 2. the challenges to the ESO of providing this information, including the challenges of publishing the reasons for the changes of system state condition.
- 8307. It was discussed that more development work would be needed. The Proposer had suggested he was prepared to speak to Ofgem in the presence of the ESO to explain the requirements. See section 15 "Governance" for further detail.

6. New modifications

8308. There were no new modifications submitted.

7. In-flight modification updates

- 8309. NA outlined the progress of in-flight modifications.
- 8310. RWo followed up on an update which he provided at the August Panel meeting on GC0103 (The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes) where he requested to work with the Proposer on some additional information which he felt may benefit the end solution. The Proposer did not wish to do this; RWo understands that the Proposer has the right to refuse this request and that, accordingly, the modification will be progressed at a time when workgroup meetings can be restarted.
- 8311. RL and RWo agreed that the Panel should expect to see some kind of intent from proposers to keep low priority mods 'current', e.g. potentially corresponding with workgroup members on actions whilst workgroups are on pause, such that when they are reprioritised and start meeting that there isn't a 'cold start'.
- 8312. TM agreed with the comments raised and asked if Code Admin could provide progress updates on these modifications at future Panel meetings.

- 8313. **DECISION** The Code Administrator to provide updates on modifications where little movement has been made and NA to engage more with Proposers to provide input at Panel meetings.
- 8314. AF raised a point on modification GC0121 (Grid Code changes in the event the UK leaves the EU without an agreement) where a Final Modification Report can only be submitted after no-deal. A brief discussion clarified the process; the ESO will 're-raise' this modification at the October panel. It needs some very minor revisions, mainly relating to the implementation date. It will be proposed to go straight to Code Admin Consultation and subsequently a draft Final Modification Report will be shared with Panel. If the UK leaves the EU at the end of the transition period on 1 Jan 2020 without a deal, then a Panel meeting will be required to confirm the FMR for submission to Ofgem. If a deal is reached, then it is likely that the modification will not be required.
- 8315. NA advised Panel that GC0136 (Non-material changes to the Grid Code following implementation of the EU Connection Codes) will be re-baselined in October resource dependant.
- 8316. On modification GC0145 (Updating the Grid Code to include the Manually Activated Reserve Initiative (MARI) NA updated Panel that the BSC (Balancing and Settlement Code) solution is going to require much more detail than the Grid Code solution. While subsidiary documents for how to use MARI will be created in the IS (Information System) development phase (as for TERRE), Elexon do not have the same process and this will cause a delay in issuing out the Grid Code Code Admin Consultation as this needs to align with the BSC Code Admin Consultation.
- 8317. RWi advised that the workgroup just needs to continue for now and in the absence of any clarity over future EU arrangements or changes to timescales.

8. Discussion on Prioritisation

- 8222. Discussions around the prioritisation of modifications took place. Panel used the information on the new prioritisation stack to make their decisions on the priority order of the stack.
- 8318. GC0109: GS reiterated concerns that this had been raised as an urgent modification 2.5 years ago (although urgency was rejected by Ofgem) and still isn't moving quickly. RWi noted again that it has been awaiting completion of an action by the Proposer since October 2019, hence why some panel members had proposed moving it down the stack.
- 8319. NA advised Panel that now that a robust plan in collaboration with the Proposer is in place to progress it, it will need to be retained in its current stack position to ensure Code Administrator resource is available to progress it.
- 8320. **DECISION** GC0109 to stay in position 3 in the prioritisation stack as agreed by all Panel members.
- 8321. GC0144 Ofgem confirmed the importance of this modification and the need for the Code Administrator to progress this. Consequently, the Panel moved this modification higher in the prioritisation stack, from position 12 to position 4, given the key requirement for compliance and that it is also associated with imminent decisions on NCER submissions.

- 8322. GS asked NA if modification GC0141 (Compliance Processes and Modelling amendments following 9th August Power Disruption) will be progressed at normal pace and what impact there would on progression if it's at position 6 in the prioritisation stack.
- 8323. NA advised Panel and Ofgem that resource has been allocated for delivery of workgroups on the top five modifications in the stack which are to be held each month. The Code Administrator's view of planned workgroup meetings for the next four months can be found in the slide pack for Panel.
- 8324. The Panel noted that, if it decides that GC0133 should be sent to a workgroup then the modification will have to be part of the prioritisation discussion at the next Panel meeting.

The Prioritisation Stack can be found here

9. Workgroup Reports

8325. There were no reports.

10. Draft Modification Reports (DFMRs)

- 8326. GC0131 'Quick Win' Improvements to Grid Code Open Governance Arrangements was presented by NA.
- 8327. Panel was advised on the two Code Admin Consultation responses received.
- 8328. One respondent believed that the Original and WAGCM1 (Workgroup Alternative Grid Code Modification) would both improve the efficient development of modifications by clarifying the process and providing additional governance flexibility, but they had the view that WAGCM1 better facilitates the Grid Code objectives.
- 8329. One respondent believed that both the Original and WAGCM1 better facilitate objective (v) in improving the administration and efficiency of the Grid Code arrangements. In facilitating a more efficient code modification process and removing blockers they will also help in the development of the system so improving objective (i). The Original was better as, in treatment of alternatives, it aligned with the legal text in the Standard Licence Conditions that require an alternative to be assessed for potential development by a workgroup against the original proposal and not, as currently, the baseline.
- 8330. Both respondents supported the proposed implementation approach in terms of: -
 - The changes made in this modification should apply to any new modifications and any existing modification in progress.
 - No significant costs are expected in implementation. In applying this modification to any work in progress efficiencies will begin to be achieved immediately.
- 8331. One respondent cited nine minor issues with the legal text which have been assessed by the Proposer and the Panel.
- 8332. The legal text suggested changes to address the issues were considered by Panel and they were asked if the changes can be accepted as typographical.
- 8333. **DECISION** all issues apart from Issue 7 on the Legal Text were accepted; this last one was agreed by all to not be needed.

- 8334. A recommendation vote was carried out and the Panel voted on whether the Original Proposal or WAGCM1 better facilitates the Grid Code objectives. Eight Panel members voted for WAGCM1 and one member voted for the Original.
- 8335. **DECISION** The recommendation from Panel was to implement WAGCM1. The Final Modification Report will be sent to Panel for five working days to confirm that their votes and voting statements have been accurately recorded. Subsequently, this will be issued to the Authority on 07 October 2020 for their decision.

11. Reports to Authority

8336. GC0142 (Adding Non-Standard Voltages to the Grid Code) with its SQSS equivalent GSR026 (Adding Non- Standard Voltages to the SQSS) had been sent to Ofgem on Monday 21 September 2020. The decision is pending with Ofgem.

12. Early Competition Presentation

- 8337. Mike Oxenham presented on Early Competition which was being developed at the request of Ofgem to look at opening transmission needs to competition at an early stage. The team are seeking views on the proposed high-level model (formed alongside discussions with stakeholders) as phase 3 is due to be released in November.
- 8338. RWo asked Mike Oxenham to explain the role of the procurement body.
- 8339. Mike Oxenham clarified that the role is to help choose the best solution for the networks' need, so either Ofgem, ESO or any other parties suitable can input to this.
- 8340. The party appointed to carry out any works will be responsible for the revenue period but there will be a need to sell on to the TO and controlled measures would have to take place to help the party taking it on gain the right level of ability.
- 8341. Mike Oxenham advised Panel that in the next consultation phase, there may be some measures included on the last resort process.
- 8342. GN asked, when someone is appointed to manage the assets, then will there be a change to Panel membership as a result?
- 8343. Mike Oxenham advised that there will be a potential impact, and this will be looked at in the workshops which are taking place. The bigger impact would be in the STC (System Operator Transmission Owner Code) but there may be some requirements for alignment in the Grid Code where references are made to TOs or for standards owned by the TOs, for example. Modifications will take place after Ofgem has made their decision. The biggest impact on Grid Code would be on the governance side as to how CATO (Competitively Appointed Transmission Owner) representation would work in the Panel.
- 8344. DJ asked how this process fits into the NOA (Network Options Assessment) process.
- 8345. Mike Oxenham advised on the potential link to NOA and how the team is currently working to tie this process in. The team are working to see in how it works with Network Planning and incumbent TOs (Transmission Operators) and if the ESO's (Electricity System Operator) role needs enhancing in any way will depend on the license.
- 8346. Discussions around long duration storage took place. Ofgem's threshold for inclusion in early competition was £50m, which obviously covers boundary reinforcements, but other items can be looked at for any transmission needs, connections to substations or

- potentially pathfinder developments. Phase 2 and 3 of the work may still change and a further plan will be produced in February, all still subject to Ofgem approval.
- 8347. GS advised Panel that this will all apply to new and separable projects above certain thresholds as noted.
- 8348. Mike Oxenham stated that the late model is being produced separately and while there are many similarities there are some key differences.
- 8349. **NEW ACTION** Mike Oxenham to share the slides with NA for them to then be circulated to Panel.

13. Implementation updates

8350. There were no updates.

14. Electrical Standards

8351. There were no updates.

15. Governance

- 8352. **GC0133 (Ofgem decision and next steps for Panel instruction).** Panel was invited to either instruct this to go back to a workgroup or reissue to Code Admin Consultation.
- 8353. NA recommended establishing a workgroup as he believed that re-issuing the Code Admin Consultation would not be appropriate as it is likely that it would only result in the same responses being received.
 - The Panel noted the update that had been provided by the Proposer.
- 8354. DJ noted an interaction with the EDTF (Energy Data Taskforce), the basis of which is data transparency, unless justification could be provided to not do this. He believed that Ofgem sending this back is almost going against the conclusions of the taskforce findings.
- 8355. GS advised that, while transparency is an important principle in their send back of GC0133, Ofgem had asked for further information on how the information would be used and the benefit since Ofgem had not been provided with a clear justification. He also agreed that going straight to Code Admin Consultation again would not yield different results.
- 8356. DJ stated that Ofgem's position is contradictory. They want to understand the benefits vs their own taskforce which have said it should all be presumed to be open, unless justified not being so.
 - The Chair reminded the Panel that the send-back letter was a Direction from Ofgem that the Panel was required to accept.
- 8357. **DECISION** Following Ofgem's decision, the Panel decided that this should be sent to a workgroup to develop the requirements requested by Ofgem. Nominations will be sought by the Code Administrator for this modification and the Terms of Reference to be agreed at the next Panel meeting. The Chair asked that the Terms of Reference paid clear attention to the detail in Ofgem's letter.

- 8358. **NEW ACTION** NA to draft Terms of Reference for GC0133 ahead of next Panel meeting.
- 8359. **NEW ACTION** Code Administrator to discuss with the Proposer if he would like to attend the GCDF to ensure that a broad range of market participants are involved.
- 8360. Change of Modification Title for GC0137 to pick-up generally used industry terminology.
- 8361. Existing title: Minimum Specification Required for Provision of Virtual Synchronous Machine **(VSM)** Capability.

Proposed new title: Minimum Specification Required for Provision of GB Grid Forming (GBGF) Capability (formerly Virtual Synchronous Machine/VSM Capability)

The new title was proposed by the workgroup due to the specification being evolved over time and will avoid confusion with other projects in GB and Europe of a similar nature.

8362. **DECISION** The Panel approved unanimously the new title without further comment.

16. Grid Code Development Forum (GCDF)

- 8363. NA briefed the Panel on the GCDF, workgroup days and discussions in September. He advised that Mike Oxenham had presented at on Early Competition and Matthew Dietz of Energy UK had presented on the findings from the E3C report on the 9 Aug 2019 incident.
- 8364. Next GCDF Meeting: Day 07 October 2020 which may be cancelled if no agenda items are received.

17. Standing Groups

Distribution Code Panel Update

8365. There was no update as no DCRP meetings had been held since the August Grid Code Panel meeting.

Joint European Stakeholder Group (JESG)

NA advised that, at the JESG:

- 8366. Bernie Dolan had provided an update on "A18 Consultation on Dynamic Containment" and how it will be procured for the soft launch.
- 8367. Robert Selbie had provided an update on Elec-Link.
- 8368. Grahame Neale had provided an update on the "Upcoming BSC Modification: Imbalance charges for non-BM balancing service providers"

18. Updates on other Industry Codes

8369. There were no updates.

20. Forward Plan Update

- 8370. EBGL Changes were presented by NA to Panel.
- 8371. Code Admin have made change to the proposal form to allow EBGL impacts to be noted.

21. Any Other Business (AOB)

8372. RW noted, in response to a comment from AC that 'Whole System Technical Code Digitalisation' is a potential deliverable under NGESO's RIIO T2 submission and could include both, the Grid and Distribution Codes. A potential step towards this could be to look at the combination of these codes into a single 'whole system' technical code, however at the moment these are only proposals and would obviously need further work.

The next Grid Code Review Panel meeting will be held on 29 October 2020 at 10:00 via WebEx.

Modification Proposals to be submitted by 14 October 2020.

Grid Code Review Panel Papers Day is 21 October 2020.