

Grid Code Review Panel

Minutes: 29 April 2021

Grid Code Review Panel Minutes

Date: 29/04/2021 **Location:** Microsoft Teams

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
Alan Creighton	AC	Panel Member, Network Operator Representative
Alastair Frew	AF	Panel Member, Generator Representative
Christopher Smith	CS	Panel Member, Offshore Transmission Operator Representative
Gurpal Singh	GS	Authority Representative
Graeme Vincent	GV	Alternate, Network Operator Representative
John Harrower	JH	Panel Member, Generator Representative
Joe Underwood	JU	Alternate, Supplier Representative
Jeremy Caplin	JC	BSC Panel Representative
Rob Wilson	RWi	Panel Member, National Grid ESO
Roddy Wilson	RW	Panel Member, Onshore Transmission Operator Representative
Sigrid Bolik	SB	Panel Member, Generator Representative

Observers/Presenters

Attendee	Initials	Company
----------	----------	---------

Laetitia Wamala	LW	National Grid ESO, Presenter GC0149
Roberta Fernie	RF	Ofgem, Presenter
Tom Faulkner	TF	Cornwall Insight, Observer
Bryan Rhodes	BR	Frontier Power, Observer

Apologies

Attendee	Initials	Company
Steve Cox	SC	Panel Member, Network Operator Representative
Robert Longden	RL	Panel Member, Supplier Representative

1. Introductions and Apologies

Apologies were received from Steve Cox and Robert Longden. Tom Faulkner and Bryan Rhodes were welcomed as observers, Roberta Fernie from Ofgem as a presenter and Laetitia Wamala from ESO presenting new modification **GC0149**.

2. Minutes from previous meeting

Subject to the incorporation of minor amendments proposed by AC, the minutes from the Grid Code Review Panel meeting held on 25 March 2021 were approved.

3. Review of actions log

The Panel approved for actions items **400, 402, 403** to be closed as they were completed.

The actions log can be found [here](#).

4. Chair's update

There were no updates.

5. Authority Decisions

Ofgem stated that pending decisions on **GC0147** and **GC0144** would be made week commencing 10 May 2020.

GC0144 – ‘Alignment of Market Suspension Rights to the EU Emergency and Restoration Code Article 35.1(b)’ &

GC0147 – ‘Last resort disconnection of Embedded Generation – enduring solution’

Post Panel: GC0144 has been approved by the Authority. The Authority has directed that this Modification be implemented on 26 May 2021.

Post Panel: GC0147 has been approved by the Authority. The Authority has directed that this Modification be implemented on 17 May 2021.

Code Modification decision timings update - Roberta Fernie, Ofgem

A presentation was made by RF on Ofgem's current approach to Code Modification Decisions and how Ofgem feel that the KPI 'Key Performance Indicator, approach is not providing sufficient benefits around transparency in the decision-making approach or providing the

certainty to the industry that it could. RF also advised Panel that these slides have been presented to all Panels including the CACoP ‘Code Administrator Code of Practice’ forum.

In summary, Ofgem’s current Key Performance Indicators for making code modification decisions is:

- to issue 90% of decisions within 25 working days (after we receive the Final Modification Report (FMR) or the closing date of our Impact Assessment/consultation); and/or
- where relevant, to issue an Impact Assessment or consultation 3 months after we receive the Final Modification Report.

Ofgem’s intention is that this new process will:

- Be based on providing dates that each decision will be made shortly after submission.
- Give more transparency on when we will aim to make decisions.
- Still allow our performance to be visible by continuing to report on decisions.

Panel raised questions in relation to how the new timings will work if the 25 day key performance indicator is removed and how would the decision dates be determined? Ofgem stated that the expected decision date will be based on the importance, urgency and impact of the modification – considering strategic priorities. The Code Administrator raised some concerns that longer turn-arounds of decisions may cause more issues for implementations and rework in having to re-baseline the Legal Text.

6. New modifications

GC0149 – ‘Grid Code changes to reflect the terms of the UK’s departure from the EU’ with broadly the same legal text.

Following the previous submission in February 2019 of **GC0121** ‘Grid Code changes in the event the United Kingdom leaves the European Union without an agreement’ which sought to modify references to EU Regulations and bodies, the modification was later withdrawn by the ESO in January 2021 following the signature of the UK-EU Trade and Cooperation Agreement (TCA) on 24 December 2020.

A new modification proposal has now been made by the ESO to cover the terms of the TCA, **GC0149** - Grid Code changes to reflect the terms of the UK’s departure from the EU with broadly the same legal text as GC0121.

The ESO felt the TCA ‘Trade and Cooperation Agreement’ did not outline in detail the relevant arrangements that will apply regarding the Grid Code and in the absence of further information, it was proposed to update the Grid Code now to correct content that became out-of-date at 11pm on 31 December 2020 while acknowledging that further changes may be required in the future.

DECISION: Panel approved the self-governance route and that the modification should proceed straight to Code Administrator Consultation. Panel was asked to note that there was no impact on the Electricity Balancing Guideline, and the revised timeline was approved.

7. In flight modification updates

NA outlined the progress of the **in-flight modifications**. It was brought to Panel’s attention that there were 17 in flight Grid Code modifications.

Concerns were expressed by Panel around reconvening the **GC0117** workgroup before a further prompt for nominations was made given the length of time this workgroup had been on hold. It had been agreed in the **GC0117** workgroup that, given the scope was better understood on completion of the initial work, seeking new members as well as ensuring the current list of members were still available would be beneficial.

AC also raised some concerns that giving the industry less than a week's notice to join a workgroup meeting was too optimistic and asked why the Code Admin had moved away from sending out meeting doodle polls. NA advised that Code Admin are moving towards a project management approach and using a new project management tool, smart sheets, which provide a project management view for the year helps provide a firm view of when to have WG meetings to avoid clashes with other meetings and forums.

ACTION: Code Admin to send out **GC0117** nominations email to wider industry prior to the workgroup meeting which is to be held on 19 May 2021.

Panel was informed that **GC0138** '*Compliance process technical improvements (EU and GB User)*' & **GC0141** '*Compliance Processes and Modelling amendments following 9th August Power Disruption*' had made very good progress after the workgroup consultation had closed on 30 March 2021. NA advised Panel that 3 subgroups (*Independent Engineer, Control Interaction and SSTI, Modelling Appendix*) have been formed to review various aspects which were raised as part of the workgroup consultation.

AC raised concerns around the progression of Grid Code modifications in relation to CUSC modifications. NA, whilst presenting the project plan using the new project management tool, smart sheet, stated that a 12 month rolling cross code approach gave a more enhanced view of Code Admin time and the progression of each modification. There are a lot of important CUSC modifications which have been raised but NA provided assurance that the Grid Code modification are also progressing as per the comments made on the modification tracker.

At this point, the Chair also expressed her views regarding how much progression was being made on Grid Code modifications by Code Admin.

8. Discussion on Prioritisation

The Panel reviewed the prioritisation stack.

The following modifications were discussed as, in the Panel's view, they have strategic priorities but are not sufficiently progressing due to their position in the prioritisation stack:

GC0140 '*Grid Code Sandbox: enabling derogation from certain obligations to support small-scale trials of innovative propositions*'

- It was highlighted by Ofgem that this is an important modification and the risk is that it is strategic for BEIS '*Business, Energy and Industrial Strategy*' in terms of sandbox requirements and Ofgem are keen to see progress also.
- GS stated that this has been on hold since March 2020, all Code Panels are asked to contribute towards innovation and are asked to play a central role, Ofgem are likely to criticise the progression soon if no progression has been made.
- JC stated that BSC '*Balancing Settlement Code*' Panel had implemented the sandbox modification in August 2018 and are now starting the first back stop progression under the sand box.

The chair, on the back of comments made by Ofgem on innovation, said that there has been a 1+ year delay since March 2020 and supported progress on **GC0140**.

GC0103 '*The introduction of harmonised Applicable Electrical Standards in GB to ensure compliance with the EU Connection Codes*'

Concerns around why **GC0103** was put on hold were raised to which RWi advised, that as he recalled there is an outstanding action of concern that the Transmission Operators had which would need to be addressed if **GC0103** was to move in the prioritisation stack. The Chair agreed with this.

DECISION: The prioritisation stack remains unchanged and will be published via the headline report.

The updated Prioritisation Stack is included in the Headline Report which can be found [here](#).

9. Workgroup Reports

There was one Workgroup report presented to Panel.

GC0134 *'Removing the telephony requirements for small, distributed and aggregated market participants who are active in the Balancing Mechanism'*

Panel was presented with the **GC0134** workgroup report. The modification seeks to remove a barrier to entry to the Balancing Mechanism by allowing smaller parties to participate via a web-based API *'Application Programming Interface'* link, rather than requiring telephony.

Before the specific discussion on the modification, the Chair observed that she had recently noted, generally, a trend of additional, continual, Legal Text changes by Panel, some of which were suggested quite late in the day and which ran the risk of unduly causing delay on modification progress. While neither the accuracy of legal text, nor due governance process, should ever be compromised, she had asked Code Admin to review any way in which Panel processes could be streamlined to avoid delays where at all possible and also to reduce the likelihood of any resulting confusion in version control. NA advised Panel that all feedback and comments are valuable, and that Code Admin are hoping to work alongside Panel to improve the process and help to understand optimum timescales.

NA reminded the Panel that, at the April Grid Code Review Panel Meeting, Panel had been asked to agree that the workgroup had met its Terms of Reference, based on the Legal Text provided to the Panel for **GC0134**. However, the Panel had proposed further legal text changes and referred it back to the Workgroup to consider these.

The subsequent Legal Text summary, approved by the workgroup, was presented to Panel (see *slide 29*) and also including further changes suggested by AC which the workgroup was happy to adopt.

Panel ask:

- **APPROVE** the updated legal text changes (Code Administrator to circulate the approved version to Panel for 5 working days)
- **AGREE** that the Workgroup have met their Terms of Reference
- **AGREE** that this Modification can proceed to Code Administrator Consultation (subject to legal text changes being approved)
- **NOTE** the ongoing timeline

DECISION: Panel approved the Legal Text changes which were made by the Workgroup and the changes AC had proposed. **GC0134** will now proceed to Code Administrator consultation.

10. Draft Final Modification Reports

There was one Draft Final Modification Report presented to Panel for a recommendation vote.

GC0109 *'Publication of the various GB electricity Warnings or Notices or Alerts or Declarations'*

or Instructions or Directions etc. (“System Warning Alerts”) issued by or to the Network Operator(s).’

GC0109 seeks to publish on BMRS ‘Balancing Mechanism Reporting Service’ any System Warning Alerts (identified within the scope of **GC0109**) that are not currently shared with market participants.

Panel was asked to approve the proposed Legal Text suggestions (5) submitted by AC where he felt they were inconsistent to the instructions in the guidance. Panel believed that some of the changes were typographical and could be made to the Legal Text. However, Panel agreed that other suggested changes would require the Legal Text to be referred back to the workgroup, which then highlighted the risk of delay.

Panel ask:

- GR 22.4 Do Panel consider the amendments “typographical”?

Yes → Instruct Code Administrator to make changes to legal text and proceed with vote

No → Direct to a workgroup, or;

- Instruct Code Administrator to make changes to legal text and re-issue Code Administrator Consultation

DECISION: Panel unanimously agreed that suggestions 1, 3, 4 are typographical and should be made while 2 and 5, although not material, were more than typographical. Panel agreed, however, that these changes were not essential and agreed that they should not be included in the final legal text. (see slide 40)

Prior to the recommendations vote for **GC0109** taking place, the Chair agreed that Rob Wilson could express the following statement of fact which would be minuted. RWi stated that he had sought clarification of the categorisation of the warnings or alerts considered by the workgroup as the final report was not clear on this which also therefore left the impact of the modification unclear. RWi had asked if this clarification could be shared with the panel.

As a statement of fact therefore, and as set out in the final report, of the 22 warnings or alerts identified by the workgroup, 3 were removed from the scope as they were redundant or low value and resulted in unmanageable numbers of notifications, 15 are already published on Balancing Mechanism Reporting System by the Electricity System Operator, 7 currently on a voluntary basis (described in the report as cat 2, these will be mandated removing flexibility), and the remaining four for which requirements to publish will be added are:

- Capacity Market notices, which are public domain and to which the Electricity System Operator, has no specific or privileged access
- Electricity Supply Emergency Code (ESEC) instructions for rota disconnections which have not been used since 1974
- Emergency instructions to Transmission Operators (for which advice from BEIS prohibits identification of specific equipment)
- Requests to interconnectors for emergency assistance

The recommendation vote was conducted by the Code Administrator at the request of the Chair.

DECISION: The Panel by majority recommended that both the Original and workgroup alternative grid code modification (WAGCM1) better facilitated the Grid Code objectives than the baseline (current Grid Code). 6 Panel Members believed that the Original was the best option, and the other 4 Panel members expressed a preference for WAGCM1.

Post Panel: The Final Modification Report was sent to Panel on 04 May 2021 for 5 working days for approval before submitting to Ofgem on 12 May.

11. Reports to Authority

There were no reports to the Authority.

12. Implementation updates

There were no implementation updates.

14. Grid Code Development Forum (GCDF)

NA advised Panel that due to no content being provided for the April GCDF, a cancellation email would be sent out to industry.

Panel was advised that the new proposed time for the May GCDF was 09:00 – 11:00 to avoid a clash with Electricity System Operator operational transparency forum.

May agenda item:

SOGL '*Ramping conditions for active power output of High-Voltage Direct Current interconnectors are not specified in the Grid Code*'. Requirements placed upon the Electricity System Operator (ESO) through System Operator Guidelines (SOGL) Article 119 require the ESO to align the Grid Code with European code. (It is worth noting that this requirement has been retained in GB law following Great Britain's exit of the European Union.)

15. Standing Groups

Distribution Code Review Panel Update

AC provided an update from the April DCRP meeting. Distribution Code changes in relation to the connection of storage devices are progressing. In support of National Grid Electricity System Operators Accelerated Loss of Mains Change Programme, a Distribution Code workgroup is developing a change to the Distribution Code to facilitate Distribution Network Operators enforcement of the required protection changes.

GN highlighted a move by DNOs to give them powers to disconnect customers with non-compliant generation.

AF asked what progress there had been on the changes to EREC P24, AC Traction Supplies. AC confirmed that publication had been delayed to align with ongoing work on a related Engineering Recommendation, P29, relating to voltage unbalance

Joint European Stakeholder Group (JESG)

The Panel noted that JESG occurred on 13 April 2021.

16. Updates on other Industry Codes

There were no updates.

17. Blockers to Modification progress (February, May, August, November)

There were no updates.

18. Horizon Scan (February, May, August, November)

There were no updates.

19. Electrical Standards

There were no updates.

20. Forward Plan Update

Critical friends check – *Slide 56*

21. Any Other Business (AOB)

Code Administrator Survey (Ofgem)

GS took this opportunity to advise Panel that a cross code survey will take place this year, would and welcome Panel members' feedback, and requested Panel members to encourage others to take part. Savanta, formally known as Future Thinking, the company who will be conducting the survey on behalf of Ofgem will commence works in later May.

Panel collaboration SharePoint site

As part of the Code Administrator's ongoing improvements, NA felt it would be useful for Panel to have a collaborative SharePoint site, where things like file sharing can be made more efficient. The Chair had suggested that some protocols be put in place and audit trails of the information that is being shared.

The Code Administrator will work with the Chair and the Panel Members to enable a process that is efficient and effective for all stakeholders.

The next Grid Code Review Panel meeting will be held on 27 May 2021 at 10:00 via Microsoft Teams.

New Modification Proposals to be submitted by 13 May 2021.

Grid Code Review Panel Papers Day is 19 May 2021.