

Grid Code Modification Proposal Form	At what stage is this document in the process?												
<p><b>GCXXX:</b> <i>(Code Administrator to issue reference)</i></p> <p><b>Mod Title:</b> Removing the telephony requirements as part of Wider Access to the Balancing Market and moves towards automated dispatch</p> <p><i>This section is mandatory for the Proposer to complete.</i></p>	<table border="1"> <tr> <td>01</td> <td>Proposal Form</td> </tr> <tr> <td>02</td> <td>Workgroup Consultation</td> </tr> <tr> <td>03</td> <td>Workgroup Report</td> </tr> <tr> <td>04</td> <td>Code Administrator Consultation</td> </tr> <tr> <td>05</td> <td>Draft Grid Code Modification Report</td> </tr> <tr> <td>06</td> <td>Final Grid Code Modification Report</td> </tr> </table>	01	Proposal Form	02	Workgroup Consultation	03	Workgroup Report	04	Code Administrator Consultation	05	Draft Grid Code Modification Report	06	Final Grid Code Modification Report
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**Purpose of Modification:** With Wider Access to the Balancing Market due to go live in December 2019 the expectation is for small, distributed and aggregated users to begin making bids and offers to the ESO Control Centre (ESOCC). Using Telephony as a method of dispatch seems onerous for these smaller parties and impractical for the ESOCC, especially in an emergency where a large number of calls would be required to dispatch relatively low amounts of capacity. The intention of this proposal is to remove the Telephony requirement from CC.6.5 while protecting system security and providing an increase in oversight and control for the ESOCC. *This section is mandatory for the Proposer to complete. Please insert a short statement of intent.*

**The Proposer recommends that this modification should be:** *In order to be implemented in line with the Wider Access go live date*

- subject to [fast track] self-governance
- assessed by a Workgroup
- proceed to Consultation
- be treated as urgent and should proceed as such under a timetable agreed with the Authority

This modification was raised *03 October 2019* and will be presented by the Proposer to the Panel on *dd month year (Code Administrator to provide date)*. The Panel will consider the Proposer’s recommendation and determine the appropriate route.



	<b>High Impact:</b> New Small BM Participants <i>This section is mandatory for the Proposer to complete. Please provide an initial view of impacted parties (e.g. Generators, Suppliers etc.)</i>
	<b>Medium Impact</b> ESO <i>This section is mandatory for the Proposer to complete. Please provide an initial view of impacted parties (e.g. Generators, Suppliers etc.)</i>
	<b>Low Impact</b> Existing Larger BM Participants. <i>This section is mandatory for the Proposer to complete. Please provide an initial view of impacted parties (e.g. Generators, Suppliers etc.)</i>

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Timetable		 Any questions?
<i>The Code Administrator will update the timetable.</i>		Contact: <b>Code Administrator</b>
		 email address
		 telephone
		<b>Proposer:</b> Insert name
		 email address
		 telephone
		<b>National Grid Representative:</b> Insert name
		 email address.
		 telephone
<b>The Code Administrator recommends the following timetable:</b> <i>(amend as appropriate)</i>		
Initial consideration by Workgroup		dd month year
Workgroup Consultation issued to the Industry		dd month year
Modification concluded by Workgroup		dd month year
Workgroup Report presented to Panel		dd month year
Code Administration Consultation Report issued to the Industry		dd month year
Draft Final Modification Report presented to Panel		dd month year
Modification Panel decision		dd month year
Final Modification Report issued the Authority		dd month year
Decision implemented in Grid Code		dd month year

*Guidance on the use of this Template: Please complete all sections unless specifically marked for the Code Administrator. Green italic text is provided as guidance and should be removed before submission. Contact us: The Code Administrator is available to help and support the drafting of any modifications, including guidance on completion of this template and the wider modification process. If you require any advice on how to fill in this form please contact the Panel Secretary e-mail: [grid.code@nationalgrid.com](mailto:grid.code@nationalgrid.com)*

**Proposer Details**

<b>Details of Proposer:</b> (Organisation Name)	Ecotricity Group Ltd
Capacity in which the Grid Code Modification Proposal is being proposed: (e.g. CUSC Party)	CUSC Party
<b>Details of Proposer's Representative:</b> Name: Organisation: Telephone Number: Email Address:	Peter Dennis Ecotricity 01453 769 325 <a href="mailto:Peter.dennis@ecotricity.co.uk">Peter.dennis@ecotricity.co.uk</a>
<b>Details of Representative's Alternate:</b> Name: Organisation: Telephone Number: Email Address:	Mark Meyrick Ecotricity 01453 790 120 <a href="mailto:Mark.meyrick@ecotricity.co.uk">Mark.meyrick@ecotricity.co.uk</a>
<b>Attachments (Yes/No): No</b> <b>If Yes, Title and No. of pages of each Attachment:</b>	

**Impact on Core Industry Documentation.**  
*Please mark the relevant boxes with an "x" and provide any supporting information*

**BSC**

<b>CUSC</b>	<input type="checkbox"/>
<b>STC</b>	<input type="checkbox"/>
<b>Other</b>	<input type="checkbox"/>

(Please specify)

*This is an optional section. You should select any Codes or state Industry Documents which may be affected by this Proposal and, where possible, how they will be affected.*

## 1 Summary

**Mandatory for the Proposer to complete** Please provide a summary of the modification proposed – i.e. **what** is the identified defect/change in the existing code that needs to be rectified, **why** this change needs to be made, and **how**.

### Defect

CC.6.5 requires all BM participants to install control telephony between their control point and the ESOC. This is sensible when applied to large power stations but is impractical when applied to the small, distributed and aggregated participants. - *Provide a summary of the defect that needs to be rectified.*

### What

The Telephony requirement as described by CC.6.5 requires all BM participants to install telephony and for it to be operated 24 hours a day. - *Provide a summary of what needs to be changed (i.e. the baseline) so that readers have an overview of what the identified defect is that needs to be rectified.*

### Why

As it stands the Telephony clause in CC.6.5 represents a barrier to entry for small users due to the cost of implementation and the costs of operating it 24 hours a day. Furthermore, it does not seem a practical method for the ESOC to dispatch numerous small units. - *Provide a summary of why this change should be made, so that readers have an overview of the impact if the change isn't made.*

### How

The Telephony requirement should only apply to relevant users, an exemption for Wider Access participants should be inserted into the clause to allow these units to be dispatched only via the Wider Access API if they so wish. The API will then allow for more efficient automated dispatch of these smaller units. - *Provide a summary of the proposed Solution so that readers have an overview of how you propose to address the defect.*

## 2 Governance

### Justification for [Normal, Urgent, Self-Governance or Fast Track Self-Governance] Procedures

The Proposal should be considered as urgent in order to implement the change in time for the Wider Access to the Balancing Market go live in December 2019. Delaying implementation beyond go live risks delays to participants entering the market or making inefficient investments in resource that will soon not be required. **Mandatory for the Proposer to complete.** *Please state clearly which governance procedures apply and why, referring to the relevant criteria. Delete the criteria for Self-Governance or Fast Track Self-Governance if not applicable.*

**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

**OR**

**Fast Track Self-Governance - The modification** is properly a housekeeping modification required as a result of some error or factual change; including but not limited to:

- i) Correcting minor typographical errors;
- iii) Correcting formatting and consistency errors, such as paragraph numbering, or;
- iv) Updating out of date references to other documents or paragraphs.

### Requested Next Steps

This modification should: *(delete as appropriate)*

- be treated as urgent and should proceed as such under a timetable agreed with the Authority

Timetabling should ideally align with Wider Access Go Live to facilitate new users. *Proposer to provide any additional information to support your preferred next steps, such as any critical events driving the timeline.*

### 3 Why Change?

Grid code CC.6.5 was put in place with single large power stations in mind, for which Telephony provides a sensible precaution against power cuts and a means for communicating directly with operators about the nuances of their power production. However, for small distributed power stations such as wind parks these benefits do not apply. Most wind and solar parks operate autonomously, only requiring human attention during faults or planned maintenance and as such it is unusual for an operator to be at the site of the power generation. It is possible to control these plants remotely and this is generally a very simple case of setting the power set point, but in the event of a power cut there is no option for remote control.

Furthermore, manual dispatch from the ESOCC's perspective makes sense for a few large power stations but would be time consuming and inefficient for numerous small units. As such the ESOCC may find it more effective to manage the portfolio of available small BMUs through an automated dispatch system via the Wider Access API.

Currently the Grid Code allows some discretion for the ESO to choose between Control Telephony or System Telephony, but some form of Telephony must be in place and operational 24 hours a day. If the ESOCC agrees that Telephony is not practical in the case of Wider Access BMUs, the Grid Code should be adjusted to accommodate that view.

***Mandatory for the Proposer to complete.*** Please concisely set out **why** a modification of the code is proposed – i.e. **why** the identified defect/change in the existing code needs to be rectified, what happens if the change isn't made, what is driving the change, what parties are impacted? Proposers should also consider whether additional context and/or background should be included here that is not forming part of the Solution and will to assist wider understanding.

### 4 Code Specific Matters

***Mandatory for the Proposer to complete.*** Please provide any specialist information (that is Code-specific), such as technical skillsets required and any reference documents.

#### Technical Skillsets

Knowledge of ESOCC operations

Knowledge of Distributed Generation

Knowledge of Aggregation/VPP *Provide the required technical skillset that will be required to assess this modification.*

#### Reference Documents

Wider Access API specification documents *Provide any reference documents that need to be considered.*

## 5 Solution

An additional clause should be inserted into the code to define the types of user for which telephony is not required. This could be based on capacity thresholds or user type such as Virtual Lead Party, Aggregated BMU, Wider Access participant.

**Mandatory for the Proposer to complete.** *Please concisely set out in detail the Code changes that are proposed, setting out specific document changes to the Code.*

*This section is “owned” by the proposer and will not be altered by the workgroup and so should set out the change you, as proposer, wish to see made – which you can amend later to take into account issues raised by a workgroup.*

## 6 Impacts & Other Considerations

This change may impact:

1. The ESO’s restoration plan
2. Those code changes relating to Virtual Lead Parties (CMP295)
3. Those code changes relating to Project TERRE (P344, GC0097)

**Mandatory for the Proposer to complete.** *Please concisely set out in detail any potential cross-code, consumer or environmental impacts and attach or reference any other, related work.*

*Provide detail on:*

- i. Who (i.e. which industry code) is impacted;*
- ii. Which processes are impacted; and*
- iii. Systems impacted*

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

This modification shouldn’t impact the current SCR but as mentioned above may relate to modifications around Virtual Lead Parties and Project TERRE. On balance, this modification should be complimentary to these changes as they both concern bringing new market participants to the Balancing Mechanism and opening up new markets to small users.

Care will need to be taken that mechanisms proposed in other changes are not disrupted by the removal of Telephony as a requirement for smaller market participants.

**Mandatory for the Proposer to complete.** *Please provide the main impacts so that readers have an overview of how the change proposed will affect the identified SCR/project.*

### **Consumer Impacts**

The overall aim of this modification is to advance automated dispatch of the Balancing Mechanism by removing requirements for manual dispatch equipment and operation. The impact on customers should be an increase in grid stability and security with a decrease in balancing costs as automated processes are able to support more cost

effective and efficient operation of the Balancing Mechanism **Mandatory for the Proposer to complete.** Please provide the main impacts so that readers have an overview of how the change proposed will affect the Consumers.

## 7 Relevant Objectives

**Mandatory for the Proposer to complete.** Please delete the Grid Code Objectives that is not applicable.

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	None
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	None

The principle benefit of this change proposal is to remove barriers and open the Balancing Mechanism up to smaller, distributed and aggregated market participants. This will provide the ESO with a wealth of new data on the operation of these units of which it has previously had little to no visibility. This information can be used to better inform decisions by the ESO in coordinating the system and promote security of the system. Smaller units will also be able to offer their flexibility as a service to the ESO as is currently offered by larger units, facilitating effective competition in Balancing the network.

*This section is mandatory for the Proposer to complete. Please explain how this change will positively or negatively impact the relevant Code objectives and concisely explain the rationale.*

## 8 Implementation

Implementation of this modification should be low cost as it removes the requirement for costly equipment to be installed. In place of the no longer required Telephony equipment, this proposal supports the implementation of new communication and control methods currently being implemented as part of Wider Access. The links with Wider Access are key to this proposal and aligning the timescales with that programme of work would be ideal. ***This section is mandatory for the Proposer to complete. Please provide any views you have on implementation timescales, including the costs and benefits of a range of implementation options where appropriate and an assessment on how the costs will be recovered.***

## 9 Legal Text

*The Proposer is welcome to put forward suggested legal text. If this is a proposed Fast Track Self-Governance modification, then legal text and commentary must be provided. Otherwise the legal text will be provided in conjunction with the Workgroup Report to the Grid Code Review Panel before progressing to the Code Administrator Consultation.*

### Text Commentary

At first it seems the legal text to this proposal can be relatively simple being an exemption from another requirement. However, thought will need to be given to the terms of this exemption regarding who is eligible and providing obligations on these participants to ensure the alternative form of communication (i.e. Wider Access API and operational metering) is robustly implemented. *In support of the legal text provided, the legal representative will provide a plain English explanatory note setting out the approach taken to converting the Solution into legal text, illustrating how the legal text delivers the intent of the Solution.*

## 10 Recommendations

### Proposer's Recommendation to Panel

Panel is asked to: *[This section is mandatory for the Proposer to complete. Delete as appropriate]*

- Agree that Normal/Self Governance/Fast Track governance procedures should apply
- Refer this proposal to a Workgroup for assessment.
- Issue this modification directly to Consultation
- Agree that this Fast Track Proposal should be implemented