

# Grid Code Review Panel

## Minutes: 24 June 2021

### Grid Code Review Panel Minutes

**Date:** 24/06/2021      **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
Guy Nicholson	GN	Panel Member, Generator 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
Nadir Hafeez	NH	Authority Representative
Robert Longden	RL	Panel Member, Supplier 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
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### Observers/Presenters

Attendee	Initials	Company
Louise Trodden	LT	National Grid ESO, Presenter
Banke John-Okwesa	BJO	National Grid ESO, Observer
Garth Graham	GG	SSE, Proposer of GC1051
Bryan Rhodes	BR	Offshore Transmission Operator Representative, Observer

### Apologies

Attendee	Initials	Company
Steve Cox	SC	Panel Member, Network Operator Representative

## 1. Introductions and Apologies

Apologies were received from Steve Cox.

## 2. Minutes from previous meeting

A query from GN and SB on the number of incidents, as noted in the FRT presentation made to the May Panel, was added to the minutes. RWi noted that, as recorded in the Feb-April incident reports, there had been 23 'incidents' involving a total of 41 generator trips, given that a number of events involved the trip of multiple generators. The exact numbers, as in the May presentation, are dependent on the date range but are broadly correct, being the number of generator trips. No incidents have been missed.

To which RL asked if a summary of the next GCDF can be provided at the July GCRP in relation to the FRT letter.

Subject to the incorporation of minor amendments proposed by AC, AF, SB and GN, the minutes from the Grid Code Review Panel meeting held on 27 May 2021 were approved.

## 3. Review of actions log

In relation to the ask from Panel; action 400 remains open so further updates can be provided on the Fault Ride Through presentation at Grid Code Development Forum. RWi to provide this update at July Panel if required as there are still some open questions around this topic, although this is likely to be superseded by the progress on GC0151.

The Panel was advised of the remaining open actions.

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

## 4. Chair's update

There were no updates.

## 5. Urgent Modification

Panel was presented with **GC0151** 'Grid Code Compliance with Fault Ride Through Requirements' - which was proposed by Garth Graham of SSE.

The ESO's Head of Networks wrote to stakeholders on 6th May 2021 about "Grid Code Compliance with Fault Ride Through Requirements". In that letter, it set out three actions and, in the Appendix to the letter, an interim process that the ESO was proposing be applied in conjunction with Users and Network Operators.

The interim Fault Ride Through process was subsequently presented by the ESO at the May 2021 Panel meeting where concerns and queries were raised by Panel Members in relation to this process.

In the view of the Proposer, the ESO have inadvertently given rise to concerns, by stakeholders, that if they were to follow this uncodified 'voluntary' ESO interim process this would:

- 1) Be placing Users (and in particular Generators) in breach of a relevant legal requirement;
- 2) Have a significant commercial impact on Users and consumers;
- 3) Have a significant impact on the safety and security of the electricity system;
- 4) Apply an unreasonable timing obligation on some stakeholders;
- 5) Apply a discriminatory process to some stakeholders; and
- 6) Not ensure and enhance transparency of the Fault Ride Through situation in Great Britain.

In the view of the Proposer, a codified process is required to ensure legal compliance and certainty whilst maintaining security of supply and minimising the significant commercial impact on stakeholders as well as providing a reasonably timed, non-discriminatory process and enhanced transparency for stakeholders.

The Proposer recommended that this modification should be treated as an urgent modification proposal and proceed directly to Code Administrator Consultation, based on Ofgem's criteria for Urgency.

Ofgem's current view is that an urgent modification should be linked to an imminent issue or a current issue that if not urgently addressed may cause:

- a. A significant commercial impact on parties, consumers or other stakeholder(s); or
- b. A significant impact on the safety and security of the electricity and/or gas systems; or
- c. A party to be in breach of any relevant legal requirements.

More information can be found at:

[https://www.ofgem.gov.uk/system/files/docs/2016/02/urgency\\_criteria.pdf](https://www.ofgem.gov.uk/system/files/docs/2016/02/urgency_criteria.pdf)

Ask of Panel:

- **AGREE** by majority Panel has agreed for **GC0151** to proceed to Workgroup.

**DECISION:** Panel by majority agreed to proceed to Workgroup.

- NOTE that there appear not to be any impacts on the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the Grid Code
- VOTE whether or not to recommend Urgency

**DECISION:** by majority Panel recommended that **GC0151** meets the Urgency criteria and Panel have recommended this to the Authority for a decision.

- AGREE timetable for Urgency

The timeline was discussed with Panel. GG, as proposer, stated that the timeline presented is based on **CMP368/369** to give Panel a process example had been conducted by Code Admin.

AF stated that the timeline is very ambitious and suggested having 2 more workgroups on top of what was being presented, as concerns around legal text may rise too. SB asked the Panel if there had been any consideration of this issue by the working group for **GC0138/141** and suggested engaging with this workgroup as the workgroup report is currently being planned for the July GCRP.

RWi stated that the timeline suggested is very aspirational, and it would be beneficial to note it being ambitious as per the minutes, to which Panel approved. RWi also noted that the ESO letter is referred to above had set out that the ESO's intention was to propose a code modification to clarify the process for Users once an engaged proposal could be formed.

**DECISION:** **GC0151** to proceed with the suggested timeline, subject to the decision by the Authority on urgency, noting that it is ambitious.

AC asked GG if the workgroup would be looking to address the 6 May letter or to address the underlying issue? GG replied that the modification has taken on board the 6 May ESO letter and the 24 June GCRP presentation by the ESO. The aim is to have a transparent and legally compliant process in place for a suspected Fault Ride Through event, and that there is a robust process in place to understand what has happened and to share this with the industry in a timely manner.

Panel ask:

- **AGREE** Workgroup Terms of Reference (standard was presented)

**DECISION:** It was agreed by the majority of Panel, that the Terms of Reference would be circulated offline for any additions to be added before the first **GC0151** workgroup meeting.

- **NOTE** next steps:
  - Under Grid Code Section GR.23.4, we will now consult the Authority as to whether this Modification is an Urgent Grid Code Modification Proposal
    - Letter to be sent to Ofgem 24 June 2021
    - Ofgem approval of Urgent treatment sought by 5pm on 1 July 2021
    - 1st Workgroup to be held 2 July 2021

**DECISION:** Panel by majority recommended Urgency for **GC0151**.

**Post Panel decision:** *The Authority have granted Urgency for **GC0151** and the recommended timeline put forward by the Grid Code Review Panel.*

## 6. Authority Decisions

Ofgem stated that the pending decision on **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)' will be 12 July 2021.

The Chair brought to Ofgem and Panels attention that a number of stakeholders had expressed concern on systems for publication of dates. A request was made to GS to provide an update of their system at a future Panel meeting.

**Post Panel Authority decision: GC0109** *‘Publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions of Directions etc. (“System Warning Alerts”) issued by or to the Network Operator(s)’ be made.*

*The Code Administrator will implement this into the Grid Code on 23 August 2021.*

## 7. New Modification

**GC0150** *‘Housekeeping change post- GC0147 implementation’* presented by Robert Wilson.

Ofgem’s decision on **GC0147** *‘Last resort disconnection of Embedded Generation – enduring solution’* recommended that a minor housekeeping change should be made to clarify an area of cross-referencing in the new ‘Embedded Generation Control’ section OC6B of the code.

The proposed solution cross-references the priority order set out in **GC0147**, and included in OC6B, in which embedded generators are to be considered for control actions. In Ofgem’s view, as included in their decision, this will make it clearer that this should be used where possible in the implementation of any instructions for embedded generation control, as given by the ESO to DNOs. No new or amended requirements are placed on any User by this proposal, which is a clarification only.

**DECISION:** Panel approved that the modification satisfied the criteria for self-governance and that it should follow the self-governance route and proceed straight to the Code Administrator Consultation.

## 8. In flight modification updates

NA outlined the progress of the 18 **in-flight modifications**.

## 9. Discussion on Prioritisation

Panel reviewed the prioritisation stack for any movements.

NA advised Panel that, after approval of the Terms of Reference for **GC0117** *‘Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements’* at the May Grid Code Review Panel meeting, Garth Graham as the proposer had challenged some of the points raised and requested to attend July Grid Code Review Panel to address his concerns.

Panel was advised that **GC0137** *‘Minimum Specification Required for Provision of GB Grid Forming (GBGF) Capability (formerly Virtual Synchronous Machine/VSM Capability)’* held their workgroup vote where the majority voted for the original solution. Panel will be presented with the workgroup report at the July Grid Code Review Panel.

**GC0138/GC0141** was flagged as a risk of hitting July Panel due to the number of alternatives submitted which the workgroup still feel needs a lot of reviewing.

There were no movements suggested by Panel. At this point the Chair asked if Panel were to wait on the **GC0151** decision from the Authority in order for it to take a place in the priority stack. To which NA advised that, at July’s Grid Code Review Panel **GC0151** will be formally added to the prioritisation stack but is likely to be at the top, subject to Panel’s decision.

**ACTION 403:** Code Admin to circulate the decision letter of **GC0151** via email once received from authority.

**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](#).

## 10. Draft Final Modification Reports

There was one Draft Final Modification Report presented to Panel for a recommendation vote, together with one Draft Final Determination Report

NA presented [GC0134](#) – ‘*Removing the telephony requirements for small, distributed and aggregated market participants who are active in the Balancing Mechanism*’ to Panel.

The aim of this proposal is to remove a barrier to entry to allow additional participants to access and be responsive to the Balancing Market.

Current requirements include having a telephone connection to the Electricity National Control Centre, operated 24/7.

Staffing a 24/7 control point is an onerous requirement for BMUs as small as 1MW. Wider Access has created the option for units as small as 1MW to participate in the Balancing Market. If the change is not made, the barrier created by the current telephony requirements makes it less likely such small units will be able to afford to participate independently and may discourage many from doing so at all. (see slides 25-33)

### Ask of Panel:

- **NOTE** that this Modification does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the Grid Code.
- **AGREE** that the minor changes to legal text suggested by Alastair Frew are typographical and therefore can be made as follows:
  - Section BC2.9.7.2(b)(i) where it says BC2.9.7.2(ii) it should say BC2.9.7.2(b)(ii) and
  - Section BC2.9.7.2(b)(ii) where it says BC2.9.7.2(i) it should say BC2.9.7.2(b)(i).

**DECISION:** Panel approve that the changes suggested are typographical, and that they can be made to the modification.

- **VOTE** whether or not to recommend implementation
  - Does the Original proposal better facilitate the objectives than the current Grid Code arrangements?

**DECISION:** Panel carried out the determination vote and determined unanimously that the Original solution should be implemented, subject to typographical changes being made to the legal text as agreed.

- **NOTE** next steps

Code Administrator to send Final Modification Report to Panel for review for five working days for it to be then sent to the Authority on the 06 July 2021 for decision.

NA presented [GC0149](#): ‘*Grid Code changes to reflect the terms of the UK’s departure from the EU*’ to Panel. (see slides 34 – 42)

**GC0149** is seeking to ensure that retained EU law functions effectively in the context of the Grid Code following the UK-EU Trade and Cooperation Agreement and the end of the transition period. It will ensure that the Grid Code considers the provisions in the relevant



Statutory Instruments prepared under the European Union (Withdrawal) Act 2018 (as amended by the European Union (Withdrawal Agreement) Act 2020).

The objective of the modification is to implement those minor changes that can be made now, particularly to clarify references to European bodies and legislation, to ensure continued operability of the Grid Code arrangements. The Proposer noted that it was likely that further work would be needed in the future once the TCA arrangements had been further progressed.

Panel ask:

- **NOTE** that this Modification does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the Grid Code.
- **AGREE** that the changes suggested by Alan Creighton to the references are typographical and therefore can be made to the legal text.

**DECISION:** Panel approve that the changes suggested are typographical, and that they can be made to the modification.

*\*\* These can also be found in Appendix 5 of the **GC0149** DFMR folder*

- **VOTE** whether, as a self-governance modification, to determine implementation
  - Does the Original proposal better facilitate the objectives than the current Grid Code arrangements?
- **NOTE** next steps

**DECISION:** Panel carried out the determination vote and determined unanimously that the Original solution should be implemented, subject to typographical changes being made to the legal text as agreed.

## 11. Reports to Authority

There were no reports to the Authority.

## 12. Implementation updates

There were no implementation updates.

## 13. Governance

There were no Governance updates.

## 14. Grid Code Development Forum (GCDF)

**GCDF** 02 June 2021 Agenda

1. **Presentation:** [Whole System Grid Code](#) Laetitia Wamala, NGESO

To provide background on the digitalised whole system grid code ambition.

2. **Presentation:** [Model Exchange for Interaction Studies](#) ECC.6.3.17 requires Users to carry out interaction studies (SSTI, CI etc) prior to connection. ECC.6.3.17 also requires all relevant parties identified by ESO shall contribute to the studies and shall provide all relevant data and models as reasonably required to meet the purposes of the studies. ESO shall collect this data and, where applicable, pass it on to the party responsible for

the studies. Based on recently project discussions with users, ESO will publish a guidance note shortly on the detailed process to manage the model exchange; this session is to outline the high level process and seek feedback from users.

#### **GCDF** 07 July 2021 Agenda

1. Fault Ride Through Letter
2. Whole System Grid Code - Following the introduction of the Whole System Grid Code concept on 2nd June 2021, the ESO will provide a summary of stakeholder feedback received to date and discuss the draft stakeholder engagement plan and likely project timescales.

AC stated that he thought the Grid Code Development Forum was an open forum to share ideas and give background to future Panel meetings, as in likely modifications. How does this work with the Fault Ride Through letter agenda item and GC0151, what is the interaction between the GCDF and the Workgroup going to be? RWi replied saying that he envisaged that it will give opportunity for discussion and broader engagement from industry, and that prior to the raising of GC0151, it had been the ESO's intention to use GCDF to help to form an engaged proposal for clarification of the process.

### **15. Standing Groups**

#### **Distribution Code Review Panel Update**

AC advised that the Panel had discussed the Frequency Risk and Control report which highlighted a likely rise in embedded generator trips due to the more relaxed RoCoF operational procedures.

AC asked Panel to note that at the previous GCRP, it was mentioned that Distribution Code changes related to storage have now been presented to Ofgem. Ofgem on the back of the presentation advised the DCR Panel to provide them with further clarifications which AC stated had taken place. If approved it will align with the GC096 Grid Code storage modification provisions.

AC stated that feedback was received on the back of the proposals that were put forward on the Distribution Code enforcement, this was in relation to the loss of mains programme and a revised version of the proposal is being worked on which will get discussed with Ofgem in due course.

AC advised Panel that discussions around the Whole System Grid Code took place with the ESO. A separate discussion also took place via email on the back of some questions which were circulated by ESO following the Grid Code Development Forum. AC advised that the feedback and responses submitted by the DNOs will be shared in due course.

#### **Joint European Stakeholder Group (JESG)**

The Panel noted that **JESG** occurred on 08 June 2021.

### **16. Updates on other Industry Codes**

JC advised Panel that Elexon are working on the digitalised Balancing and Settlement Code.

### **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**

There were no updates.

#### **21. Any Other Business (AOB)**

##### **Plugged-in Newsletter**

NA advised Panel that the ESO have now published a “Plugged in” newsletter on the ESO website, where weekly updates from the ESO and summaries from recent code updates would be made available.

RL asked if this was a digestible addition to what is already made available to which NA stated that it is a supplement to what already goes out.

A few Panel members highlighted that some guidance notes have not been circulated to connectees or workgroup members and that potential impacts of them not receiving it should be factored in. NA stated that in order to receive communications, industry members will need to sign up to the Grid Code and CUSC mailing list. Only subscribed members will receive this communication.

NA took away an action to send out a link for the subscription.

##### **Implementation and Legal Text Improvements – Louise Trodden, ESO**

Louise Trodden presented to Panel on the legal text internal process improvements which have been worked on with alongside Code Admin as a result of previous feedback received.

LT advised that a lot of work has been put in with CA to refine internal processes and Standard Operating Procedures. This includes:

- Having a standard approach to how legal text is presented (through the process and as a working document)
- Keeping track of the baseline to avoid issues on implementation
- Having a dedicated handover process to the Code Admin Team
- Having a standard template to store Housekeeping changes
- Having more structure around implementation and legal text storage in Code Admin team
- Having a checklist for the quality assurance checks in Code Admin – internal use

AC suggested that a drop-down function on the section of Codes, so that the formatting was always consistent in the housekeeping log, would be beneficial, to which LT stated that was a good idea and will look to add that in.

LT also asked Panel if there were any further feedback for it to be then circulated offline directly to her.

General discussion on impacts of coronavirus outbreak on Grid Code (ALL)

The meeting closed with a thank you from the Chair to all Panel members, presenters, observers and facilitators of Grid Code Review Panel.

**The next Grid Code Review Panel meeting will be held on 29 July 2021 at 10:00 via Microsoft Teams.**

**New Modification Proposals to be submitted by 14 July 2021.**

**Grid Code Review Panel Papers Day is 21 July 2021.**