

# Grid Code Review Panel

Thursday 30 September 2021

Online Meeting via Teams



# WELCOME

As we continue to operate in these uncertain times and following best practice from other businesses, we want to adapt to be able to facilitate the governance process in the best possible way. Since moving to virtual Panel meetings, we have found it harder to accurately capture minutes and attribute comments correctly to attendees. We are also conscious of the impact of short periods of poor sound quality. With your consent, we wish to use WebEx to record all Panel meetings to help us accurately document minutes. We want to assure you that the recordings will be explicitly used to document minutes only and the same protocol for Panel meetings still applies in terms of strict confidentiality. As has always been the case, the draft minutes will be sent to Panel and the Chair for approval each month. Once the minutes are approved, the recording will be deleted. A reminder of this and consent will be sought at the beginning of each meeting, to be noted in the minutes.

As the independent Panel Chair, we have tested the appropriateness of recording Panel meetings with Trisha McAuley who is supportive of the approach. We welcome any comments or feedback on this.

# Approval of Panel Minutes

Minutes of the Panel meeting held 26 August 2021 to be approved at the September Panel.

# Actions Log

## Review of the actions log



# Chair's Update

Update from the Chair

# Authority Decisions and Update



## Update:

**The Authority's publication on decisions can be found on their website below:**

<https://www.ofgem.gov.uk/publications/code-modificationmodification-proposals-ofgem-decision-expected-publication-dates-timetable>

# New modifications submitted

## One new modifications submitted for September 2021

Re-presenting **GC0152**: *Updating the Grid Code governance process to ensure we capture network code on electricity emergency and restoration (NCER) change process for Article 4 Terms and Conditions (T&Cs)*



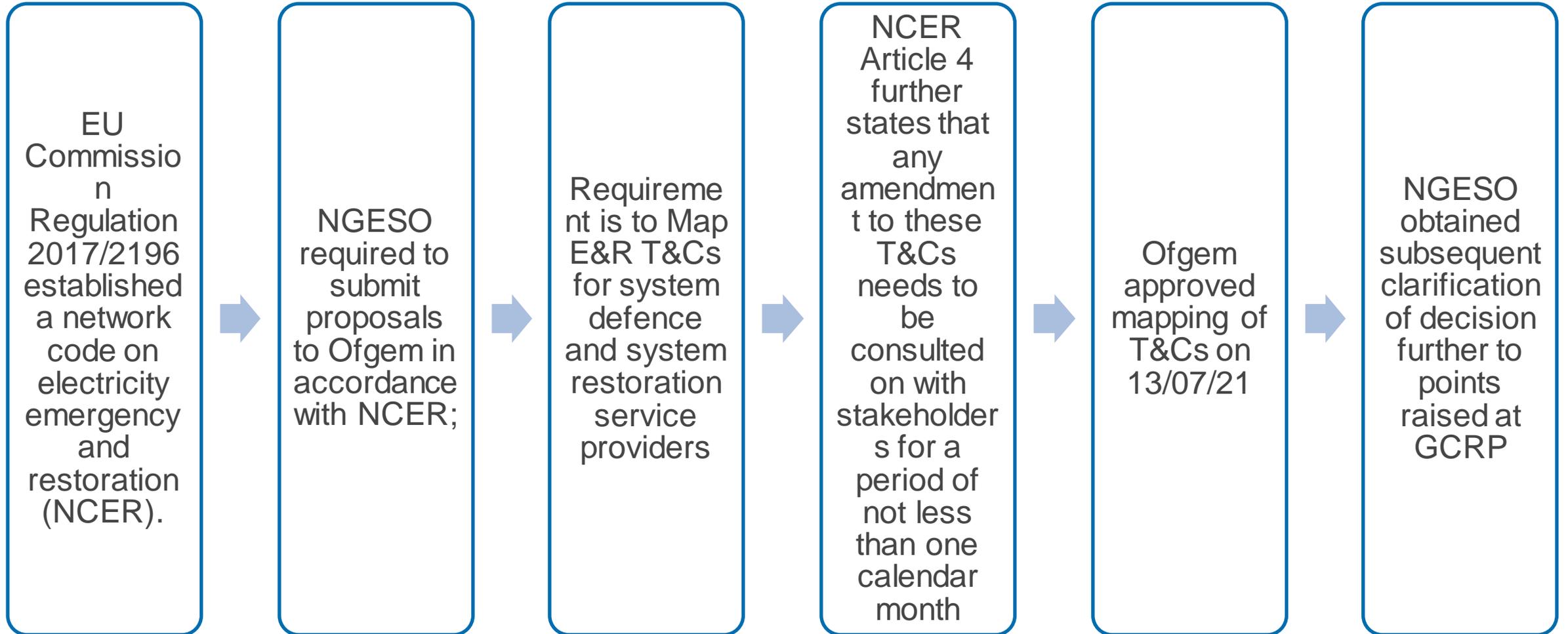


GC0152 – Updating the Grid Code governance process to align with the Emergency and Restoration Code Terms and Conditions (T&Cs) change process.

**Steve Baker, NGENSO**

nationalgrid**ESO**

# History and Purpose



# History and Purpose

- The ESO's proposals relating to Emergency and Restoration Network Code (NCER) by Ofgem on 13 July 2021
- This included a mapping from the Grid Code to the Terms and Conditions to be a system defence or system restoration service provider
- In their decision letter this action was understood by NGENSO to have been approved ([Ofgem Letter](#)) and that Ofgem recommended a minor change to align the Grid Code amendment process to the change process set out including for the T&Cs in the NCER
- Ofgem were understood by NGENSO to have approved that this should be progressed through the self-governance route

# Ofgem Decision and Subsequent Clarification of points raised at August GCRP

This modification was brought to GCRP in August 2021 and is being resubmitted following some minor changes to legal text, and clarification of points raised by Garth Graham (SSE), seeking clarity on explicitness of Ofgem’s letter of 13<sup>th</sup> July 2021. We have met with Ofgem to confirm their decision and obtained their subsequent clarification on these points:

	ITEM	UPDATE
SSE query 1	1. APPROVAL: whether Ofgem explicitly approved the T&C’s as well as the list of SGUs and High Priority SGU list which made up the three elements of the ESO’s December 2019 proposal	Ofgem have confirmed that the T&Cs are considered approved including the mapping but on the basis that the provisions of the NCER as mapped in the GC are already approved.
SSE query 2	2. SELF GOVERNANCE: Whether self-governance was intended by Ofgem as the appropriate governance route for this modification	Ofgem are happy with self-governance approach, but note this is a Panel decision.
NGESO query	Where NCER T&Cs for a system defence or system restoration service provider need to be updated, ESO would like to delegate tasks to Elexon to make appropriate BSC changes.	Similarly, to where NGESO delegated tasks to Elexon in May 2020 (tasks related to amending EBGL Article 18 T&Cs to the BSCCo and the BSC). To be confirmed but not part of this modification.

Ofgem’s letter of 13 July made several decisions on submissions made by the ESO in fulfilment of obligations stemming from the NCER. This included that the T&Cs for System Defence and System Restoration Service Providers, as submitted by the ESO using a mapping to the relevant provisions drawn from the Grid Code, BSC and the ESO’s black start strategy and procurement methodology, are now considered to be in force. Ofgem further clarified that while their letter did not specifically approve the T&Cs this was because all the provisions drawn from existing frameworks were already approved and that therefore they agreed that these mapped, and approved, provisions formed the T&Cs in fulfilment of the NCER Article 4(4).

This mirrored the approach taken in the approval of the T&C related to balancing required by Article 18 of the EBGL Regulation where it was confirmed by Ofgem, upon the satisfaction of certain conditions, that the T&C related to balancing were already held within the GB Codes.

# GC0152 – Legal Text Solution

This modification makes minor changes in order to formalise EBGL Article 18 GC0132 to achieve the cross-referencing of the T&Cs as required.

## Legal text amendments to **GR.B Regulated Sections:**

Addition to mapping of NCER Article 4 T&Cs for system defence and system restoration service providers to the Grid Code, inserting table as displayed on [Proposal Form GC0152](#)

- **GR18.9** Inserted “if a change to the areas set out in Table 1 of the Regulated Sections,”
- **GR22.2 (m)** Inserted reference to Table 1 of the Regulated Sections
- **ANNEX GR.B** Changed to i) “Table 1 - Mapping Of EGBL A18 for Balancing Service Providers And Balancing Responsible Parties to the Grid Code.” ii) “Table 2 - Mapping of E&R T&Cs for System Defence and System Restoration Service Providers to Grid Code.” Inserted new Table 2
- The consequences of the changes to the mapped clauses in the GC are that it will require a minimum 1 month consultation (this is a very similar process to EBGL A 18 as implemented in GC0132)
- No other new or changed obligations are placed on any party by this amendment.

## GC0152 – Asks of Panel

Ofgem have confirmed to NGENSO that they are comfortable with this mod going via the self-governance route, and that the T&Cs are considered approved.

- **AGREE** that this Modification meets the Self-Governance Criteria (Panel decision) rather than Standard Governance (Ofgem decision)
- **AGREE** that this Modification should proceed to Code Administrator Consultation
- **NOTE** that there appear not to be any impacts on the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code
- **NOTE** the proposed timeline

# GC0152 – Timetable





# Inflight Modification Updates

**Nisar Ahmed, Code Administrator**

# GC0151 update

## Grid Code Compliance with Fault Ride Through Requirements

- Code Administrator Consultation opened 13 September and closes 5pm 27 September 2021.
- Special Panel meeting scheduled for 07 October 2021 at 3:30pm to review DFMR and carry out recommendation vote.

# GC0139 update

## Enhanced Planning-Data Exchange to Facilitate Whole System Planning

Proposer taken action to setup Common Information Model (CIM) subgroup through the ENA/Workgroup/Panel

Long term development for CIM. Need to add this into terms of reference

CIM will be CGS standard and use this as it is and use the governance Group to adopt this.

Plan is to take initial view of CIM Governance into the Workgroup and look for guidance from various WG members.

DNOs could use an informed consultant.

Proposer and Workgroup Members have been awaiting a more complete draft of the Legal Text from ESO and their opinion is that only a skeletal version has been provided which is not sufficient to discuss at the next workgroup meeting. ESO's view is that they need a business rules document in order to develop the legal text and this has not yet been provided by the Workgroup.

**Code Administrator Recommendation:** Workgroup meetings will be halted until the CIM subgroup work is completed and therefore ask is for Panel to place this on hold for a period until CIM work is complete but leave at the top of the stack.

# GC0117 update

Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements

- Next Workgroup meeting scheduled for 28 September 2021 to review MW thresholds to be applied in England, Wales & Scotland.
- To discuss and vote on Alternative submitted by Alan Creighton.

# GC0138 update

Compliance process technical improvements (EU and GB User)

- GC0138 has been de-coupled from GC0141 and the Workgroup Report is being presented at Panel today.

# GC0126 update

Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068

- Verbal update by Rob Wilson.

# GC0146 update

Solutions for frequency control of Power Park Modules

- ESO have provided clarity in terms of the Legal Text query raised by Orsted.
- ESO have clarified all other queries raised by Orsted.
- Code Administrator have contacted them to determine if they still wish to proceed with the modification.
- Code Administrator are in a position to start workgroup meetings in December 2021.
- No response from Orsted to date.



**GC0141 - Compliance Processes and Modelling amendments following 9th August Power Disruption Modification Update & seeking Panel Guidance on Alternatives**

# Guidance from Panel Required – Code Governance

Noting the importance of GC0141 in delivering a remaining action from the 9 Aug 2019 report, the GC0141 Workgroup seeks guidance from the Panel in relation to the potential alternative, and the options below, in terms of whether this should proceed as part of modification GC0141

Option	Description	Pros	Cons
1	<b>GC0141 proceeds without alternative</b>	Modification can proceed without further delay	Any benefits of the alternative will have to be addressed separately or lost
2	<b>GC0141 proceeds without alternative which is raised as a separate modification</b>	Modification can proceed without further delay The alternative can continue to be developed separately	May extend time to deliver alternative as will require separate modification to be raised
3	<b>GC0141 proceeds with alternative and works up a detailed solution including methods, tools, roles and responsibilities</b>	Any benefits of the alternative will be delivered	<b>Will lead to significant delays in terms of the progress of GC0141</b> as further workgroup meetings will be required to develop and refine the alternative
4	<b>GC0141 proceeds with alternative but within the code delivers a high level solution only - to then be complemented with a guidance document developed by a best practice group</b>	Allows GC0141 to progress and doesn't limit detail and flexibility as could be captured in guidance and bilateral contracts  May be easier than a fully codified solution	Will still require additional time for GC0141 to be delivered  Doesn't complete the work – best practice group will need to be formed

# Modification Update

- The GC0138<sup>1</sup>/GC0141 Workgroup has met on 10 occasions including to progress several alternative proposals
- Due to the complexity of the modification, there are a number of strands relating to the key areas which have resulted in various alternatives being submitted (**see slide 3 - table of original and alternative proposals**)
- A potential alternative which would require further development has been indicated by Ben Marshall (National HVDC Centre), with the aims of addressing concerns around clarity of the process for interaction analysis when developer triggered, and that key screening criteria should be introduced to focus process

## Summary of this Alternative

The Sub-synchronous Oscillations (SSO) alternative provides Users the extra option of using screening techniques to focus and limit interaction analysis and address challenges where accurate shaft data is unavailable to allow detailed analysis of the interaction over time. These techniques are well established and are already referenced and codified under past SQSS and Grid Cod modifications GSR018 and GC077 for use by TOs in their management of SSO. These approaches are used internationally - particularly within the wind industry.

The proposal provides for-

1. The submission of so called “frequency domain” data and its validation to support its analysis
2. Builds upon the Modelling Alternative to GC0141 to outline how the data supplied and Hosted Environments defined under that alternative (for completing interaction analysis) would use the data.
3. The SSO alternative relies on the Modelling alternative (Alternative 14 in slide 3), being approved in order to proceed as a package; it relies on the data provisions and Hosted Environment definition to be established there. The SSO alternative is still to be formally proposed, discussed with the WG and voted as an official alternative for the workgroup to develop
4. It identifies how analysis can be used to screen interaction risks and handle absence of specific machine shaft data - with reference to an alternative reference to conservative reference shaft data, and generator speed testing that the owner of that machine may wish to undertake ahead of use of that data in lieu of a detailed model.

# GC0141 – Original Proposals and Alternatives

	CP/ECP.A.3.1.2 Independent Engineer	PC.3.8 Sharing for SSTI/SSCI Studies	PC.A.9 RMS & EMT Model	CC/ECC.6.3.15 Fault Ride Through Definition & Retrospective Requirements	CP/ECP.8 Compliance Repeat Plan	CP/ECP.A.3.5.4 Enhanced FRT studies	PC.A.5.3.2 Torsional Data
<b>Original</b>	Proposal - Engineer independent of User reviews simulations before submission to ESO	Proposal - ESO/TO share models as required	Proposal - specification of RMS & EMT model	Adds a time duration & retrospective requirements	Proposal - 5years submit compliance statement and DRC Schedules	Proposal - additional studies for complex connections agreed at start of process	Proposal - All Users provide torsional data (retrospective)
<b>Tabled Option 1</b>	No change from baseline (Alt 1)	ESO or TO Employ a Consultant who sees network data (Alt 6)	Proposal but EMT model encrypted (Alt 7)	No change to existing GC text for FRT (Alt 11)	Submit material changes from submission made to achieve FON (Alt 12)	No change to existing GC text for FRT studies(Alt 16)	User provides data when asked (Alt 8)
<b>Tabled Option 2</b>	>100MW (Alt 2)	User employs a Consultant who sees network data & carries out the studies (Alt 10)	Subgroup Alternative - NDA rules for User sharing of EMT agreed at connection, different technical spec (Alt 14)				
<b>Tabled Option 3</b>	>100MW & LON (Alt 3)	ESO/TO host study environment with remote access (Alt 9)					
<b>Tabled Option 4</b>	>100MW including LON, or Material Change Notified (Alt 4)	Subgroup Alternative (Ben M) (Alt 15)					
<b>Tabled Option 5</b>	>600MW (Alt 5)						

	<b>Re-submissions by Damian Jackman to be voted on by WG</b>
	<b>Alternative submitted by Marko Grizelj for discussion by WG</b>
	<b>Awaiting proposal from Ben Marshall</b>

## Potential impacts of not including the alternative as part of GC0141

View from Ben Marshall:

- In principle without the SSO alternate, SSO would still need to be addressed; but via more iterative resource intensive and specialised detailed simulation activity that would be based on “trial and error” and rely on more sensitive data exchanges between parties. This would place a greater reliance on the independent engineer (or whoever performs that role across the alternates) processes
- Neither the current original proposal, nor any of the other the alternates provide for solutions to how connections are addressed where the data exchanges specified (including those on legacy users) are not available/ practical- so the processes envisaged without the SSO mod could seize to a halt in practice under the weight of data requirements and legal arrangements needed to support each and every investigation. The SSO mod provides an extra prior step which better dimensions the interactions via data exchanges and analysis more rapidly applied
- In workgroup consultation, there was a prevalent view that the SSO mod was core to having SSO practically addressed, and envisaged within the original scope of GC0141- such that if it was not taken forward this would represent a deficiency and may influence workgroup voting and responses to the consultation
- A new modification could be raised and follow on after GC0141 to address SSO management. This would result in new workgroup discussions surrounding roles and responsibilities of analysis which the current use of Hosted Environment solves. A new modification will result in additional time to implement and introduce additional challenges and delays in obtaining the data to support the approach at an early stage
- **Whilst this alternative is not technically a showstopper, it could be seen as a lost opportunity, and increases the challenge of successfully achieving SSO management to not include the SSO alternate in GC0141. SSO could still be managed but less well. Its really the WG member concerns around its absence and the Modifications TOR deficit that would define this as a showstopper**

So, in summary:

- Not essential and could be progressed outside GC0141 but may represent a missed opportunity

# Dashboard – Grid Code (as at 16 September 2021)

Category	May	June	July	August	Sept
New Modifications	0	2 <i>GC0150</i> <i>GC0151</i>	0	1 <i>GC0152</i>	0
In-flight Modifications	17	18	18	19	19
Modifications issued for workgroup consultation	0	0	0	0	1 <i>GC0151</i>
Modifications issued for Code Administrator Consultation	2 <i>GC0134 (7 May)</i> <i>GC0149 (14 May)</i>	0	1 <i>GC0150</i>	0	2 <i>GC0151</i> <i>GC0137</i>
Workgroups held	3	3	7	4	2
Authority Decisions	0	0	1 <i>GC0109</i>	0	0
Implementations	2 <i>GC0144 – 26 May</i> <i>GC0147 – 17 May</i>	0	0	1 <i>GC0109 23 Aug</i>	1 <i>GC0134</i>



# Workgroup Reports

*GC0138 - Compliance process technical improvements (EU and GB User)*

**Nisar Ahmed, Code Administrator**

# GC0138 – Background

This Modification seeks to update the existing compliance processes to:

- Allow for more efficient delivery of a successful and quick turnaround of final site compliance testing,
- Facilitate developments in generation and HVDC technology while maintaining effectiveness of compliance process
- Strengthen effectiveness of simulations

## **Proposer's solution:**

The proposal suggests a number of separate changes to the Grid Code for the industry to consider against the BEIS/Ofgem actions to make the compliance and modelling processes for generation more robust. It seeks to update the Compliance Processes and European Compliance Processes sections of the Grid Code (CP & ECP) and Grid Code OC5 detailing Fault Ride Through Testing, submission of test data, and detailed test requirements and simulations.

If approved, the changes proposed will facilitate demonstration of compliance for final testing without on-site attendance required the ESO. The changes are intended to be pragmatic enough such that a high probability of success and quick turnaround of confirmation may be achieved, while providing the necessary reassurance of compliance for all affected parties.

The core changes will be achieved by making some additions to test procedures which are currently prepared based on site witnessing and setting some agreed standards for the format of test data to be sent to the ESO for review purposes. The manner in which test requirements are to be fulfilled is intended to be reflective of the type and scale of technology being utilised to do so compared with earlier iterations of such requirements within the Code.

# GC0138 Workgroup consultation and summary responses

Six Workgroup consultation responses were received, and no alternatives were raised as part of the Workgroup Consultation.

- The respondents were all supportive that the Original solution better facilitates the Grid Code Objectives. It has positive impacts on objectives a (permitting development, maintenance, and operation of an efficient, coordinated, and economical system), b (facilitating competition in generation and supply of electricity), and c (promoting security and efficiency of the electricity systems). These positive impacts are achieved by providing additional obligations and methods to demonstrate test results and compliance, and by facilitating the entry of larger wind turbines to enter the offshore market.
- One respondent felt that tests should not be carried out on larger generators and also felt that there should be some reference/alignment with the LVRT tests in IEC 61400-21.
- Another respondent commented that the changes should not alter the existing ability of the host Transmission Owner to attend tests or participate in the compliance process.
- A respondent commented that even though the number of scenarios to simulate could be large, the specifics of the FRT simulations contingencies could be agreed per project in the BCA but a baseline should be defined in the GB Grid Code.
- A respondent highlighted that currently there is a government CfD auction and implementing the changes prior to the CfD deadline will affect the cost of the projects. They believe that a grace period should be included in the implementation of these new changes to the Grid Code and that none of the new proposed changes to the Grid Code in GC0138 should be applied retrospectively.

The Workgroup met on 9 September 2021 to carry out their Workgroup vote. The full Workgroup vote can be found in Annex 5. The Workgroup voted unanimously that the proposed original solution was the best option.

# GC0138 Workgroup Vote

The Workgroup met on 9 September 2021 to carry out their Workgroup vote. The full Workgroup vote can be found in Annex 5.

The Workgroup voted unanimously that the proposed Original solution better facilitated the Grid Code Objectives than the baseline and therefore was the best option.

# GC0138 Terms of Reference

Workgroup Term of Reference	Location in Workgroup Report (to be completed at Workgroup Report stage)
a) Implementation and costs;	Page 10
b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text; and	Annex 3
c) Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report	Good mix of workgroup members represented.
d) Clarify who these changes apply to and whether any of the changes are retrospective	If equipment is changed then this modification becomes applicable to that plant/equipment)
e) Ensuring satisfactory assurance	linkage to the GC0141 modification has been discussed and know the scope of what needs to be covered in GC0141
f) Be aware of developments in relation to the 9th August event	Page 8
g) Consider any necessary STC changes	Page 2-3. No STC impacts applicable

# GC0138 the asks of Panel

- **AGREE** that the Workgroup have met their Terms of Reference
- **AGREE** that this Modification can proceed to Code Administrator Consultation (subject to the legal text changes being made and approved by the workgroup)
- **NOTE** that Modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?
- **NOTE** the ongoing timeline (subject to change based on legal text amendments)

# GC0138 - Timeline

## Modification process & timetable

1

- **Proposal form**
- 14 March 2020

2

- **Workgroup Consultation**
- 9 March 2021- 30 March 2021

3

- **Workgroup Report**
- 30 September 2021

4

- **Code Administrator Consultation**
- 05 October 2021 – 15 November 2021

5

- **Draft Modification Report**
- 16 December 2021

6

- **Final Modification Report**
- 06 January 2021

7

- **Implementation**
- Within 10 working days of Ofgem decision



# Draft Final Modification Reports (DFMR)

**GC0133 – Timely informing of the GB NETS System State condition**

**Nisar Ahmed, Code Administrator**

# GC0133 Background

This Modification will require the Transmission System Operator (TSO) for GB National Grid Electricity System Operator (NGESO) to inform, in a timely manner, the System State condition of the GB National Electricity Transmission System (NETS) to market participants.

This modification was raised 14 October 2019.

The original GC0133 Final Modification Report received a send-back decision by the Authority on 4 September 2020 due to insufficient evidence to support whether the modification would impact relevant objectives (a) and (c) of the Grid Code.

A Workgroup was subsequently set up as directed by the Grid Code Review Panel to address:

- The benefits of the modification to market participants and stakeholders; and
- The challenges to the ESO of providing this information, including the challenges of publishing the reasons for the changes of system state condition.

The Code Administrator Consultation was issued on the 13 April 2021 and closed 13 May 2021.

DFMR was presented at May 2021 Panel but was sent back to the Workgroup to address the benefits and risks as well as issues with the Report.

# GC0133 Ofgem Decision

Ofgem direct the Panel to revise the FMR so that further analysis in respect of objectives (a) and (c) is 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.*

# GC0133 – Code Administrator Consultation

## **Code Administrator consultation summary**

The Code Administrator Consultation was issued on the 13 April 2021 and closed 13 May 2021 and received 3 responses from National Grid ESO, Scottish Power Renewables and SSE Generation.

## **On whether the Original better facilitate the Grid Code Objectives?**

Two out of the three respondents supported the Original proposal in that it better facilitates the Grid Code objectives.

These two respondents believe that if market participants are constantly informed of the GB NETS ‘System State’ condition they can then work more efficiently to support the ESO’s operation of the NETS based on the provision of reliant and up-to-date information.

They also believe that this will create additional transparency for the whole industry and result in enhanced operations of the GB NETS as is required by Article 4(1)(g) and 4(2)(b) of the System Operation Guidelines), allowing for improved security and efficiency of the overall system.

One respondent believes that the ESO itself has full access to all this information on the System State: therefore, it is not in a strong position to judge what value market participants, stakeholders and end consumers will obtain from greater transparency of this information in a timely manner.

# GC0133 – Code Administrator Consultation

The respondent believes that the changes to the System State will result in the following benefits:-

- (i) leads to deeper understanding and greater clarity of the operation of the transmission system;
- (ii) leads to better decision making;
- (iii) leads to a more efficient electricity market;
- (iv) leads to enhanced competition within the electricity market; and
- (v) leads to lower costs to consumers.

One of the three respondents does not believe that this proposal better facilitates the Grid Code objectives.

Their rationale is that the work carried out by the workgroup does not address the requirements as listed below in the send back letter from the Authority:

- The benefits of the modification to market participants and stakeholders; and
- The challenges to the ESO of providing this information, including the challenges of publishing the reasons for the changes of system state condition. They feel that although a further discussion of the merits of the solution resting on greater transparency took place it was without determining specific benefits.

# GC0133 – Code Administrator Consultation

The respondent believes that it is not clear what stakeholders will do with the system state information or what positive steps, of benefit to the consumer, they would be able to take upon receiving it.

The modification is neutral against objectives (a) and (b) in neither facilitating development of the system nor competition in generation.

Better communication during an emergency could highlight a positive against (c) in enhancing security of the system, but is neutral for the modification as a whole. As a benefit of this modification has not been identified then it is negative against (d) in ultimately costing consumers money and impacting efficiency, and finally it is neutral against (e) in having no impact on code administration arrangements.

# GC0133 – Code Administrator Consultation

## On supporting implementation approach

One of the three respondents believes that an implementation date of around 6 months after the code modification is approved would give the ESO time to develop, with stakeholders, the right messaging required to support the basic system state information, to make sure that this was suitable, and to limit the risk of misinterpretation.

Given that the system state is currently monitored and updated by the ESO through the ENTSO-E Awareness System which is a platform for information sharing with other TSOs used within the ESO Control Room. Therefore one respondent feels that continually determining the state of the GB system and updating the BMRS accordingly are both tasks that are currently undertaken today by the ESO, there would be no need for either a transition period or a prolonged implementation period.

The third respondent supported the implementation approach.

## Additional comments

There is concern from one respondent on the potential for media misreporting of the system state or for incorrect conclusions to be drawn from this, particularly when the system is in 'alert' state.

One respondent believes that the specific requirements from the Authority send back letter have been addressed through comments in the modification report and in the additional comments provided in the consultation response. These address in detail the benefits of the modification to market participants and stakeholders and also the challenges to the ESO of providing this information,

# GC0133 – Code Administrator Consultation

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# EBR Article 3 Objectives

**For reference, the Electricity Balancing Regulation (EBR) Article 3 (Objectives and regulatory aspects) are:**

1. This Regulation aims at:

- (a) Fostering effective competition, non-discrimination and transparency in balancing markets;
- (b) enhancing efficiency of balancing as well as efficiency of national balancing markets;
- (c) integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;
- (d) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;
- (e) ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;
- (f) facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;
- (g) facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.

# GC0133 - Asks of the Panel

- **NOTE** that this Modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code?
- **VOTE** whether or not to recommend implementation
  - Does the Original proposal better facilitate the objectives than the current Grid Code arrangements (baseline)?
- **NOTE** next steps

# GC0133 Timeline

Milestone	Date
DFMR presented to Panel for recommendation vote	30 September 2021
Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	04 October – 11 October 2021
Final Modification Report issued to Ofgem	12 October 2021
Ofgem decision	TBC
Implementation	Within 10 working days following decision

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# Reports to Authority

**None**

# Implementation Update

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

Approved by the Authority 18 August 2021. The Authority has directed that the Original proposal of this Modification be implemented on 01 September 2021.

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**Governance**

**None**



# Grid Code Development Forum and Workgroup Day(s)

**Nisar Ahmed, Code Admin NGESO**

# Grid Code Development Forum

## GCDF 07 September 2021

### **GCDF Process**

Brief presentation that introduced a proposed structure and process for the GCDF going forward, and invite comments for further discussion.

### **Whole System Technical Code**

Presented the content of the digitalised WSTC draft consultation paper and sought views from stakeholders. The team also be notified stakeholders of the opportunities to provide comments on the consultation when it opened.

### **Managing System Stability and Fault Ride Through with Declining System Strength**

With system strength data being requested by Users only at the design stage, there is a risk that the obligation for enduring compliance could be overlooked. To address this risk, ESO intend to engage with other industry stakeholders to highlight the issue, identify what data is necessary for any assessment, and agree the best way to communicate this data going forward.

## GCDF 06 October 2021

**SQSS Review** - Topics for a general review of the SQSS are currently being scoped as part of the ESO's deliverables for RII0-2. Looking to engage industry in relation to this.

**WSTC** - Opportunity to advertise the consultation that will have been published in September and closing in November

# Standing Items

- **Distribution Code Panel update (Alan Creighton)**
- **JESG Update (information only)**

# JESG Update

**Joint European Stakeholder Group meeting for September was held 14 September 2021.**

[Agenda](#)

[Presentation pack](#)

The next JESG meeting will be on [12 October 2021](#) starting at 10am.

The background features several decorative yellow lines. In the top-left corner, there are several thin, curved lines that sweep across the frame. In the bottom-right corner, there are several thick, parallel diagonal lines that create a sense of movement and depth.

# Updates on other industry codes



# Blockers to Modification Progression

(February, May, August, November)



# Horizon scan

(February, May, August, November)



# Electrical Standards

None



# Forward Plan Update/(Customer Journey)

None



**AOB**

**1. GC0109 Implementation Update**  
**Rob Wilson, NGENSO**



# GC0109 implementation update

Sept 2021

nationalgridESO

# Recap of GC0109 impact

GC0109 was implemented in the Grid Code on 23 Aug 2021

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 and 15 were already published on BMRS by the ESO, 7 on a voluntary basis (these are now mandated)

The remaining four new notifications in BMRS relate to:

- Capacity Market notices
- ESEC instructions for rota disconnections
- Emergency instructions to TOs (for which advice from BEIS prohibits identification of specific equipment)
- Requests to interconnectors for emergency assistance

# Screenshot from BMRS – 29 Aug 2021

Two of the four categories of new warnings/alerts to add to BMRS had occurred:

ELEXON  
BMRS

LECTRICITY DATA SUMMARY    REMIT    TRANSPARENCY    **TRANSMISSION**    DEMAND    GENERATION    BALANCING

Home > Transmission > System Warnings



System Warnings	
Warning Date/Time (GMT)	Warning Text
2021-08-29 06:27	A request for Emergency Assistance has been agreed on a GB connected Interconnector. Volume of request is 400 MW from GB from 07:00 29/08/2021 to 08:00 29/08/2021.
2021-08-27 10:10	NGESO has requested a Transmission Owner discontinue an outage within relevant Emergency Return to Service time, under STC Section C Part 2 (7).

# Reporting

On the 29 Aug incident:

The Daily Telegraph reports that Britain has asked France to send less electricity across the Channel after technical problems with a trading platform in Europe threatened a risky surge of power. It is noted that National Grid ESO has published a notice to the market detailing: “A request for Emergency Assistance has been agreed on a GB connected Interconnector. Volume of request is 400 MW from GB.”

# Next Panel Meeting

**10am on 27 October 2021 via  
Microsoft Teams**

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**Papers Day – 19 October 2021**

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**Modification Proposals to be  
submitted by 12 October 2021**

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**Close**



**Trisha McAuley**

**Independent Chair, GCRP**