

Digitalised Whole System Technical Code Consultation 1

1. Executive Summary

Reform of industry codes is a concept that has gained increasing traction in industry, particularly since the BEIS/Ofgem Energy Codes Review consultation in 2019. Digitalisation of some codes is already being progressed within industry. National Grid Electricity System Operator (NGESO) included a proposal for a digitalised whole system technical code during its RIIO-2 industry consultation process in 2019. This sought to digitalise and consolidate the Distribution Code (and its associated Engineering Recommendations (ERECs)), which relates to the distribution systems, and the Grid Code, which relates to the transmission system. In this document when we refer to technical codes, we are referring to the Grid Code and the Distribution Code (and its associated ERECs). NGESO committed to ensure that there was engagement from industry on the direction of this work from the outset; this was set out in our RIIO-2 documentation. Industry engagement at various forums since June 2021 has been focussed on building awareness of the project and has informed this consultation.

Stakeholder feedback to date suggests that benefits of the proposed consolidation and digitalisation could include; more efficient resource requirements for a connection journey, increased market participation, encouragement of innovation in the market, more user-friendly codes and streamlined implementation of changes. This consultation is seeking views on whether these benefits are achievable which will inform the scope of the codes consolidation proposal. These benefits are widely viewed as enablers for the Government's 2050 Net Zero target.

This consultation proposes potential high-level solutions for digitalisation and increasing alignment or consolidation of technical codes which have been informed by the initial stakeholder engagement. Potential solutions for code consolidation or alignment range from making no change to developing a new single Whole System Technical Code (WSTC). Digitalisation potential solutions include progressing from the current searchable PDF code documents to an artificial intelligence driven service.

Consolidation of codes is dependent on the reform outcomes being led by BEIS and Ofgem, and stakeholders suggest that this project has potential to provide valuable input to this reform process. Opportunities are also proposed that could be pursued in parallel with code reforms and deliver value earlier. These no-regret options include; simplification and rationalisation of the existing codes (collectively or individually), whole system alignment of key areas within the technical codes, inclusion of the SQSS as an annex to the Grid Code, and digitalisation of individual technical codes. In advance of the outcome of the reform being led by Ofgem and BEIS, any changes would need to be made under the existing code governance arrangements.

Phase 1 of this project is expected to conclude by 31 March 2022 and focuses on stakeholder engagement to confirm the project scope. This consultation aims to gather views on the scope, objectives and approach, and will guide the formation of an industry-led governance structure for the project. Further engagement or consultation will be developed and published by the project members and steering group (as informed by this consultation). The phases that follow will look to deliver the scope developed through Phase 1. Deliverables that are independent of the BEIS/Ofgem Energy Code Reform (ECR) may be delivered ahead of the outcome of the ECR programme. Project activity that is relevant to the ECR will be fed into the ECR programme.

A critical element of this consultation is the proposed industry-led governance structure for the project. The consultation seeks views on, and participation from, industry regarding the proposed steering group, joint workgroups and overall governance to progress the project.

2. Introduction

Reform of industry codes is a concept that has gained increasing traction in industry, particularly since the BEIS(Ofgem Energy Codes Review consultation in 2019. Since April 2019, NGESO held stakeholder engagement discussions (workshops, working group round tables, consultations, bilateral stakeholder and trade association meetings) with industry about consolidation or alignment of the Grid Code and the Distribution Code (and its associated Engineering Recommendations (ERECs)) as one of the proposals for their RIIO-2 delivery plan. During this period, Ofgem and BEIS released their first joint Energy Codes Review consultation in July 2019. One of the proposed reforms was code simplification and consolidation. In this document when we refer to technical codes, we are referring to the Grid Code and the Distribution Code (and its associated ERECs).

In November 2019 NGESO included the consolidation of the Distribution Code (and ERECs) and Grid Code in their RIIO-2 delivery plan. It was included as an ambition to consolidate the technical codes to deliver one digitalised Whole System Technical Code (WSTC) by 2025 and committing to ensure that there is engagement from industry on the direction of this work from the beginning. As part of their final determination on the NGESO RIIO-2 delivery plan, Ofgem approved the WSTC ambition. NGESO commenced work on the project in May 2021.

NGESO has consulted at various industry forums¹ since June 2021 to gather initial input on the scope, objectives and approach for this consultation and the wider project. The information gathered from the engagements at these forums has been used to inform this consultation.

Since the project started, Ofgem and BEIS released the joint Energy Codes Reform (ECR) consultation in July 2021, reiterating that code simplification and consolidation is one of the four areas for reform, with further consultation on this subject expected to follow. Ofgem have provisionally agreed to attend the project steering group.

Stakeholder feedback suggests that this project is an opportunity to support the ECR outcome relating to code simplification and consolidation, while also addressing some of the challenges of using the technical codes by identifying and addressing "quick wins". This is especially important as the system continues to transform, meaning that whole system thinking, and operation, becomes increasingly important to reaching the net zero target.

Initial feedback has identified challenges with the technical codes which fall into two broad categories:

- There are a number of technical codes which are written with varying degrees of specificity. This can sometimes lead to confusion for industry participants when looking to understand which codes are applicable when.
- The codes are lengthy and overly complex and thus a barrier to entry, and also difficult to navigate for parties.

Further feedback is being sought from stakeholders on the issues industry are experiencing.

Q1. What challenges do you have with using the technical codes?

Q2. Where there are challenges, please provide examples of areas where you would like to see change.

¹ Balancing and Settlement Code Panel (BSCP), Ofgem, bilateral meetings with DNOs, Grid Code Review Panel (GCRP), Grid Code Development Forum (GDCF), Industry Technical Codes Group (ITCG), The Association for Decentralised Energy (ADE) Flexibility Forum, Flexible Generation Group (FGG), Major Energy Users' Council (MEUC) and Renewable UK's (RUK) Networks & Charging forum, Department for Business, Energy & Industrial Strategy (BEIS)

3. Potential Solutions

This section outlines potential solutions that have been suggested by stakeholders during initial engagement. These solutions aim to address the issues identified above, realise the benefits described below and, recommendations are made where stakeholder feedback has been clear.

Figure 1 illustrates that the two key dimensions of digitalisation and whole system consolidation or alignment creates several possible end states. Stakeholders have also emphasised that adopting a phased approach to delivery will be critical, as some changes (such as code consolidation) will be decided by, and delivered following, the publication of the Ofgem/BEIS ECR decision. Once identification of the solutions of interest for stakeholders has been completed, a high-level assessment of costs associated may be explored through further consultation.

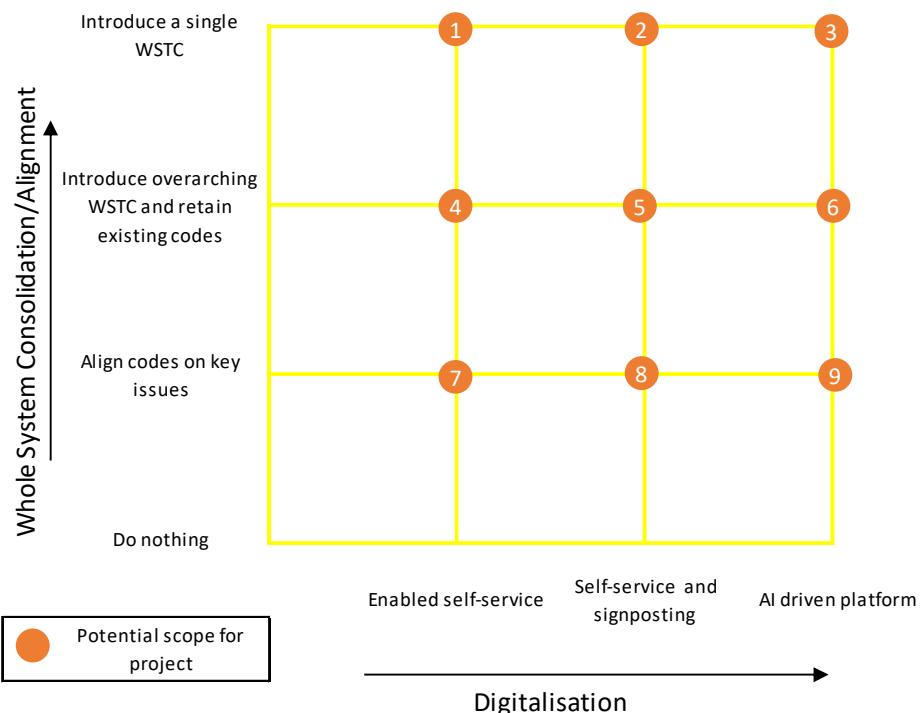


Figure 1: Potential Solutions

3.1. Whole System Consolidation or Alignment

The vertical axis in Figure 1 illustrates progressively more aligned solutions for technical codes as suggested by stakeholders:

- **Do nothing:** This solution would retain the existing technical codes. Stakeholders have indicated that this does not address the identified challenges. Furthermore, this solution wouldn't align with an expected outcome of the Energy Code Review relating to code simplification and consolidation.
- **Align the technical codes on key issues:** This solution proposes identifying if there are any key areas of the Distribution Code (and ERECs) and Grid Code that are common but not currently aligned, and aligning them, whilst retaining the existing codes.

Stakeholders have suggested the following examples which may benefit from improved code alignment:

- System security requirements: Although the P2/7 (part of Distribution Code) and the Security and Quality of Supply Standard (SQSS) previously shared a common basis, over time the planning

documents have evolved separately leading to different interpretations of what security must be provided.

- The legal framework for enforcing compliance is subtly different in that the transmission connected parties are usually licensees in their own right and compliance is a requirement of their licence. Very few users of the distribution system are licensed, so DNOs rely on general contract law for enforcing compliance. Surety of compliance is becoming an increasingly important factor as higher proportions of demand are now supplied at a DNO level than at a transmission level.
- **Develop an overarching WSTC and retain the existing technical codes:** This solution proposes that the existing technical codes are retained and a new WSTC is introduced to replicate those requirements in the Distribution Code (and ERECs) and the Grid Code which are applicable to distribution connected parties participating in the balancing mechanism. This will avoid the requirement for such parties to refer to both the Distribution Code and Grid Code.
- **Develop a single WSTC:** This solution proposes to simplify and consolidate the Grid Code, Distribution Code (and ERECs), SQSS and their subsidiary documents, plus other in-scope engineering standards into a single WSTC. The single WSTC would include the following attributes:
 - Focus on ensuring safe and secure operation of the electricity system by providing minimum technical requirements or standards.
 - Retain all current technical requirements. As consolidation or alignment is not aimed at changing the technical content of the codes, any content deemed outdated or irrelevant could be raised as modifications via the existing code governance process for execution via the appropriate Code Review Panels; (currently the Distribution Code Review Panel (DCRP), Grid Code Review Panel (GCRP) and SQSS panels).
 - Removal of unnecessary detailed prescription and duplication. The codes contain a level of prescription and duplication to ensure that there is consistent interpretation of requirements by all stakeholders. It is noted that there is significant commonality and alignment between the Grid Code and Distribution Code (and ERECs) in some areas (for example the European RfG Connection Conditions and EREC G99).

The single WSTC could optionally also have the following attributes:

- The explanation of the technical requirements could be re-written to explain the technical requirements in a simplified way and written in plain English. This would address concerns expressed by stakeholders whilst retaining the existing technical requirements to ensure overall system robustness.
- As far as practicable, written in a way to eliminate the risk of being open to misinterpretation and not introduce additional obligations to existing users or network operators.

Licence Considerations

It is noted that for solutions that introduce a new code, the need to amend the Transmission, Distribution and Generation licence conditions to reflect a new WSTC should be considered. Existing bilateral connection agreements between network companies and their customers may also need to be updated to reflect the new code. Furthermore, references to the technical codes from other industry codes, such as commercial codes will need to be updated.

Separately, stakeholders have noted that this project is relevant to the Whole Electricity System considerations in Condition D17 of the Transmission License and Condition 7 of the Distribution License which were implemented in May 2021.

Q3. Are there further advantages and disadvantages of the potential solutions above?

Q4. Which of the issues identified in section 2, (or by yourself in answer to Q1) would be addressed by each of the solution options?

Q5. Are there additional potential solutions for whole system alignment which could deliver value?

3.2. Digitalisation

Stakeholder views about digitalisation of the technical codes have been sought via a variety of engagement channels such as the ESO Markets Forum, code panels, stakeholder meetings and other industry forums. Stakeholders continue to support digitalising codes as set out in the NGESO RIIO-2 business plan. Initial stakeholder views indicate that digitalisation has clear benefits and should progress independently of the outcome of the ECR, or any consolidation or alignment of the codes.

Stakeholders have noted the value in NGESO continuing to engage with other code administrators who have undertaken this exercise, to ensure that lessons learned from the process can be considered for this project. It is clear that the concept of 'digitalisation' can take several forms and so there needs to be an ongoing discussion as to what a digital technical code might look like and this will happen within the steering group meetings. Some of the potential solutions are set out further below.

One key concern that has been raised is that the ECR outcome may result in changes to code governance and digitalised code platforms being under different management than at present. Therefore, any solution taken forward should be interoperable with other platforms and transferrable to a different code administrator / manager, if required, in order to avoid stranded investment in technology.

The Distribution Code (and ERECs) and Grid Code are currently in the form of searchable PDF's available on relevant websites. Feedback from early engagement has also noted that having examples of what a digitalised platform might look like would be valuable. At this early stage, NGESO is seeking feedback on high level concepts, and is looking to capture any key risks or ideas that stakeholders put forward, with the aim of providing an example for comment at a later stage. A core principle of the project is to ensure that stakeholders are consulted along the way to ensure the platform which is developed is as beneficial as possible.

The below summarises the potential solutions we have identified through engagement to date:

- **Do Nothing:** This is the current state. There are electronic documents, updated on the Distribution Code and Grid Code websites that can be searched to find the relevant information.
- **Enabled Self-Service:** Digitalisation would enable self-service to better signpost and improve the users' experience e.g. a 'smart search' that enables market participants to retrieve code information from elsewhere in the code that is relevant to them.
- **Self-Service with cross-code signposting:** In addition to the enabled self-service, at this level of digitalisation, the web portal would provide a function that can signpost a user to other relevant codes in which they have obligations.
- **Artificial intelligence driven platform:** In addition to the previous level of digitalisation, at this level, the web portal would provide an artificial intelligence driven function:
 - Highlighting all other areas which are impacted when a change is made to a single section.
 - Highlighting the areas where the user's obligations include requirements that are being taken through the modification process.
 - Improving the capability of the user, for example a front end portal would enable a user to input the data applicable to their project (e.g. size, connection location, technology type etc) and for the system to then highlight which codes and obligations would be applicable to them. This would enable the user to have a better feel of the obligations applicable to them, especially new users.
 - The ability to still search through the code manually (as currently available) to address ad hoc questions and queries.

- Q6. Are there additional potential solutions for digitalisation which could deliver value?**
- Q7. Which of the potential solution(s) for digitalisation do you see as providing the most benefit?**
- Q8. What risks and/or opportunities do you see in digitalising codes in parallel to work on code alignment, potential consolidation, and the Energy Codes Reform programme? Please also share your views on how best to mitigate these risks.**

Legal Considerations

Stakeholders have raised questions around the legal standing of a future digitalised code. The main theme arising from these conversations has been around the advantages and disadvantages of the digitalised WSTC being legally binding, or for guidance only. Table 1 shows a summary of the feedback that we have heard so far.

Table 1: Legal considerations of a digitalised code

Legal Standing	Advantages	Disadvantages
Legally binding	<p>No other code text would be necessary.</p> <p>Once implemented, a single, legally binding code is less complex to maintain.</p>	<p>As a legally binding document creates obligations and potential liabilities for signatories, the implementation period may be longer in order to ensure a higher level of quality, and to lower the risk of errors. Additionally, an "agile" or prototyping approach to development would not be appropriate. Any delay in delivery would also delay the realisation of benefits.</p>
Guidance Only	<p>Less resource intensive to deliver, so some benefits may be able to be realised sooner.</p>	<p>The improvement in accessibility may be partially offset by the need to check back to the binding legal text.</p> <p>The maintenance of the codes may become more complex and more resource intense if the original versions of the codes remain active for legal purposes.</p>

- Q9. Do you think the digitalised codes should be legally binding or for guidance only? Why?**

3.3. Code Governance

Stakeholders have raised questions regarding which party would be responsible for the management of a WSTC, should this be the solution that is pursued. The arrangements for code governance are currently under review by BEIS/Ofgem as part of their Energy Codes Reform consultation and it is unlikely that the governance arrangements for a WSTC could be finalised until their review had been completed. The WSTC project provides an opportunity to feed industry expertise and perspective into the ECR programme, which is a critical element of any reform.

3.4. Work that can progress independently of the ECR outcome

During stakeholder engagement, it has been highlighted that there is valuable work that could progress independent of the ECR process and outcome:

- Simplification and rationalisation of the Distribution Code (and ERECs) and Grid Code separately. There are concerns that the Distribution Code (and ERECs) and the Grid Code contain very different levels of detail and complexity, and this could be addressed through existing code governance arrangements.
- Identifying and aligning areas within the Distribution Code (and ERECs) and Grid Code that could deliver value in a similar way to the previous alignment of the connection conditions e.g. Planning Codes and Operating Codes. It is recognised that there are some areas which are already well aligned.
- Digitalisation of the Grid Code and Distribution Code (and ERECs) as separate programmes of work. Digitalisation, managed by the respective panels, would need coordination to ensure that the platforms can be easily consolidated in future if necessary.
- Inclusion of the SQSS in the Grid Code.
- Inclusion of P2/7 in the Distribution Code.

Q10. Do you see value in progressing these work packages independently of the ECR and do you think they should be progressed?

Q11. Are there other opportunities that could be considered?

3.5. Delivery of Solutions

The delivery of the solutions outlined in Figure 1 could be phased in different ways. Each of the potential solutions have different options for phasing. Not all the options have been considered here, and the examples below illustrate various implementation possibilities.

1. Whole system alignment work that isn't dependent on the ECR outcome could:
 - a. deliver modifications through existing governance processes that improve whole system alignment
 - b. develop detailed recommendations for alignment that would be delivered later as part of ECR implementation
2. Consolidation or alignment of codes or creation of new codes could be:
 - a. considered by the WSTC project with recommendations fed in to the BEIS/Ofgem ECR process
 - b. postponed until the outcome of ECR is known, with the outcome then potentially delivered by the WSTC project or alternatively by new processes emerging from the ECR
3. Digitalisation could focus on:
 - a. digitalisation of the Grid Code only
 - b. digitalisation of the Distribution Code (and ERECs) only
 - c. digitalisation of the Grid Code and the Distribution Code (and ERECs) as separate, coordinated projects
 - d. digitalisation of the Grid Code and Distribution Code (and ERECs) together (i.e. on one common platform)

- e. wait to digitalise technical codes until the outcome of BEIS/Ofgem ECR decision on consolidation is known

- Q12.** Stakeholders have articulated that there is strong interdependence between options in whole system code consolidation or alignment (Section 3.1), digitalisation (Section 3.2) and the delivery of solutions (Section 3.5). Do you have a preferred combination of these solutions that you see delivering the best value considering the issues implementing the solutions? Please provide a rationale for your response.
- Q13.** Are there other aspects of the project delivery where you see risks and opportunities to mitigate these?

4. Key Benefits

This section seeks to identify and confirm the key benefits of the WSTC project. The benefits may be achieved to a greater or lesser extent depending on how the scope of project is formed and how the solution is delivered.

4.1. More efficient resource requirements for a connection journey

Stakeholders have fed back that the codes are complicated and difficult to navigate. By digitalising, simplifying and consolidating or aligning the codes, this barrier for market participants (and potential future participants) can be lowered.

Code digitalisation can reduce the time and effort taken by users to understand their connection requirements and obligations, while a more simply written, more accessible, and better aligned technical code may also lead to a greater likelihood of projects succeeding in delivery. This reduction in cost and risk across industry will ultimately flow through as lower costs for consumers and in particular benefit new users who previously have been unfamiliar with the connection process or industry codes.

4.2. Increased market participation across the whole system

Stakeholder feedback has indicated that it is difficult for owners and operators of Small and Medium Power Stations to identify and understand their obligations in the codes because the Grid Code and Distribution Codes are written differently and thus there is value in harmonising and simplifying the way in which the obligations are described. As the trend of decentralisation continues, a WSTC, provided that it explains users' obligations as simply as possible, has the potential to lower this barrier to entry, particularly in relation to the technical requirements required for participation in the balancing services markets. (It is important to note that the commercial requirements relating to participation in the balancing services markets and set out in the CUSC / BSC and are outside the scope of the WSTC project). Any resulting increase in market participation should increase competition and lead to more efficient outcomes for consumers.

4.3. Encouraging innovation in the market

With barriers to entry being reduced by digitalising and consolidating the technical codes and simplifying the way in which the codes are written, a consequential benefit could be that new and innovative technologies can be encouraged to enter the market. This could bring benefits to consumers through novel, lower cost services.

4.4. User-friendly technical codes

Feedback received has indicated that a single technical code should create a single set of user-friendly technical requirements. Stakeholders have said that if a new code was written, or the existing code re-written in plain English, it would be easier to use and understand and could help to avoid misunderstanding or misinterpretation of legal text. This would lead to a much wider spectrum of users being able to participate in a wider range of electricity markets and the code modification process. However, stakeholders also note that a drive for simplification can sometimes be in tension with the need to retain the detail and technical robustness

necessary to reduce risk for users and maintain the integrity and reliability of the wider system, hence the focus should be to retain technically robust codes, but to explain the requirements as simply as possible.

4.5. Streamlined implementation of changes across the whole system

The current arrangements require a joint workgroup to be set up to agree the details of any code modification that affects both the Grid Code and the Distribution Code (and ERECs). Once defined and agreed, the modifications are progressed in parallel at both the DCRP and the GCRP and then implemented in each of the technical codes.

Stakeholders have fed back that a single WSTC could provide faster decision making and understanding of the impacts across the technical codes. Other stakeholders have also expressed concern that changes that only affect one code e.g. the Distribution Code (and ERECs) would take longer and be more difficult to implement if, for example, the modification process was similar to that of the Grid Code.

Q14. Do you agree with the key benefits outlined above and can you see other benefits resulting from this project?

5. Project Governance

This section makes proposals about the digitalised WSTC project governance.

5.1. Decision Making

Figure 2 shows the proposed governance structure which includes feedback from initial stakeholder engagement for digitalisation and consolidation.

Authority: Ofgem and BEIS remain the ultimate decision maker for recommendations arising from this project.

Code Panels (or equivalent): Any changes to individual technical codes recommended by this project will be raised as modifications under the existing code governance arrangements. Progress updates for code digitalisation will be provided in order to seek input.

Steering group: See section 5.2 for the proposed Terms of Reference of the project steering group.

Workgroups: The workgroups will be created to work on specific opportunities to align or consolidate codes.

Membership will be drawn from across industry but as a minimum there would need to be representation from users of each impacted code.

Advisory Groups: Advisory groups would be a combination of existing industry bodies or forums and bespoke engagement (e.g. digitalised WSTC webinars). The steering group and workgroups will seek input and feedback from them on questions and draft material.

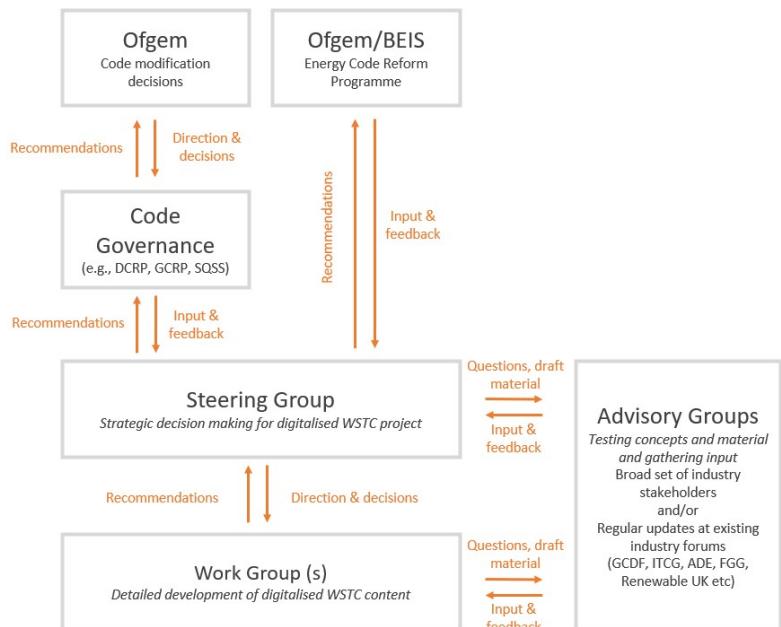


Figure 2: Proposed decision-making during project execution

- Q15.** Do you think that the proposed governance structure will enable delivery of the project? Would you change any aspects? If so, why?
- Q16.** Which elements of the project would you, or your organisation, like to be involved in? If so, please state in what capacity, and provide a short description of the perspective and value that you would bring to the project.
- Q17.** What principles should apply when forming membership and ways of working for the various project groups?

5.2. Proposed Terms of Reference - Steering Group

Membership:

The steering group is proposed to have an independent chairperson, a technical secretary and membership to include representation from the following groups: DNOs (1-2), ESO (1), IDNO (1), Ofgem (1), BEIS (1), Distribution Code parties (1-2), Grid Code parties (1-2), wider industry (1), consumer groups (1), Citizens Advice Bureau (1), trade associations (1-2), Distribution Code administrator (1), Grid Code administrator (1), and Transmission Owners (1-2).

NGESO will deploy resource to fulfil the technical secretary role.

Frequency: It is proposed that the steering group should meet at least once each month as soon as it is instituted and for it to continue for the duration of the project.

Responsibilities: It is proposed that the steering group should have the responsibility to:

- Instigate and provide direction to workgroups
- Provide recommendations to the existing technical code panels and the BEIS/Ofgem ECR programme
- Direct any questions and concepts for testing towards the advisory groups
- Consider asks and recommendations from the existing technical code panels and the BEIS/Ofgem ECR programme

- Q18.** What are your views on the proposed Terms of Reference for the steering group?

- Q19.** Do you have further views on how to best include all relevant perspectives in the governance of the project?

- Q20.** How do you think the steering group should make decisions, particularly if there is not consensus?

5.3. Stakeholder Engagement

Stakeholder engagement during the consultation period

Thus far the project team has gathered input and feedback by attending a variety of forums, panels, industry groups and meetings. This has included GCDF, ITCG, ADE, FGG, MEUC, BSCP, BEIS and RUK² among others. Generally, the forums meet on a monthly basis and obtaining an audience is subject to the agenda allowing the necessary time. The project recognises that stakeholder engagement is essential to the success of the project and a cross-sectional view will continue to be sought from across industry.

² Balancing and Settlement Code Panel (BSCP), Ofgem, bilateral meetings with DNOs, Grid Code Review Panel (GCRP), Grid Code Development Forum (GCDF), Industry Technical Codes Group (ITCG), The Association for Decentralised Energy (ADE) Flexibility Forum, Flexible Generation Group (FGG), Major Energy Users' Council (MEUC) and Renewable UK's (RUK) Networks & Charging forum, Department for Business, Energy & Industrial Strategy (BEIS)

Due to the wide range of stakeholders that are impacted by this project, the project team propose to maintain regular communications with stakeholders by hosting regular webinars throughout the first consultation period.

Stakeholder engagement during project execution

Once the project has commenced, it is important that the project can keep a broad stakeholder base informed and engaged. We propose the following regular communications to ensure that the industry is kept engaged on the progress and decisions for the WSTC project.

Webinars: A monthly webinar, to provide detailed updates on decisions taken at the steering group, progress made at joint workgroups, any advice given by advisory bodies, requests for any feedback required from members, what is planned to take place over the next month and further ahead as needed. The webinars will be published online, after the event, where it can be accessed by interested parties unable to make the meeting at the scheduled time.

Website: A web page has been created to disseminate information to stakeholders. All WSTC documentation (consultations, meeting minutes, agendas, schedules) will be uploaded to the website for stakeholders to access.

Email Contact: Stakeholders should be able to contact the project team at any point.

- Q21. What are your views on the proposed stakeholder engagement? Is there more that can be done to ensure effective stakeholder engagement?**
- Q22. Would you like to attend the webinars? If so, please leave your contact details in your feedback.**
- Q23. Would you like to request a regular update from the project at your forum? If so, please leave contact details of your forum in your feedback.**

5.4. Schedule

During Phase 1 of the project the main goal is to define the scope, objectives and approach with industry stakeholders. Therefore, it is likely that there will be a need to consult further before confirming the scope and plan by 31 March 2022.

A decision on the defined and proposed scope will be published on or before 31 March 2022.

The ambition in the NGESO RIIO-2 business plan is to deliver the WSTC project by end of March 2026.

	Milestone	Date
Draft Consultation	WSTC draft issued to industry for comment	06/09/21
	Webinars on the draft consultation	07/09/21, 08/09/21 & 16/09/21
Consultation	WSTC Consultation 1 issued to industry	27/09/21
	Webinars	05/10/21, 11/10/21, 20/10/21, 02/11/21, 05/11/21, 10/11/21
	WSTC Consultation 1 closes	12/11/21
	First proposed Steering Group meeting	Before 17/12/21

- Q24. What are your views on the proposed schedule?**

6. How to Provide Feedback

Issued: 27/09/21

Respond by: 12/11/21

Feedback can be provided by email or through the planned webinars.

This consultation is available online here:

<https://www.nationalgrideso.com/industry-information/codes/digitalised-whole-system-technical-code>

Please respond via email at: box.wholesystemcode@nationalgrideso.com