Grid Code Review Panel

Thursday 16 December 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 Microsoft Teams 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.



Purpose of Panel & Duties of Panel Members

The **Panel** shall be the standing body to carry out the **functions** referred to in the Governance Rules (GR3.1.1)

Functions (GR.3.2)

The **Panel** shall endeavour at all times to operate:

- in an efficient, economical and expeditious manner, taking account of the complexity, importance and urgency of particular Modification Proposals; and
- With a view to ensuring that the Grid Code facilitates achievement of the Grid Code Objectives.

Duties of Panel Members & Alternates (GR.3.3)

- 1. Shall act impartially and in accordance with the requirements of the Grid Code; and
- 2. Shall not have any conflicts of interest.
 - Shall not be representative of, and shall act without undue regard to the particular interests of the persons or body of persons by whom he/she was appointed as Panel Member and any Related Person from time to time.



Approval of Panel Minutes

Approval of Panel Minutes from the Meeting held 25 November 2021



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



GC0154

Incorporation of interconnector ramping requirements into the Grid Code as per SOGL Article 119

Louise Trodden & Tom Ireland December 2021



national**gridESO**

Drivers



GB Compliance driver



Operational drivers

Compliance

Ofgem's decision letter regarding the Intermediate Methodologies requires the ESO to achieve alignment with the GB frameworks by incorporation relevant provisions into the appropriate sections of the Grid Code and the NETS SQSS

Such provisions include ramping arrangements as set out in article 3 of the LFC Block Operational Agreement

Ramping for BMUs is included in the Grid Code- this does not cover interconnectors

SOGL Art 119c requires ramping restrictions to be determined for power generating modules in accordance with Art 137.3 and interconnectors in accordance with 137.4

Operational

Increasing levels of interconnection- concern if all interconnectors react to the same coupled market signal

The current interconnector ramping approach and rates are not feasible for the future- this could significantly increase the amount of reserve required

Current arrangements are in bespoke agreements and new connections are based upon a precedence that was set whilst enduring solutions were considered- not considering system capabilities

VikingLink (Denmark) is under construction now



Assumptions

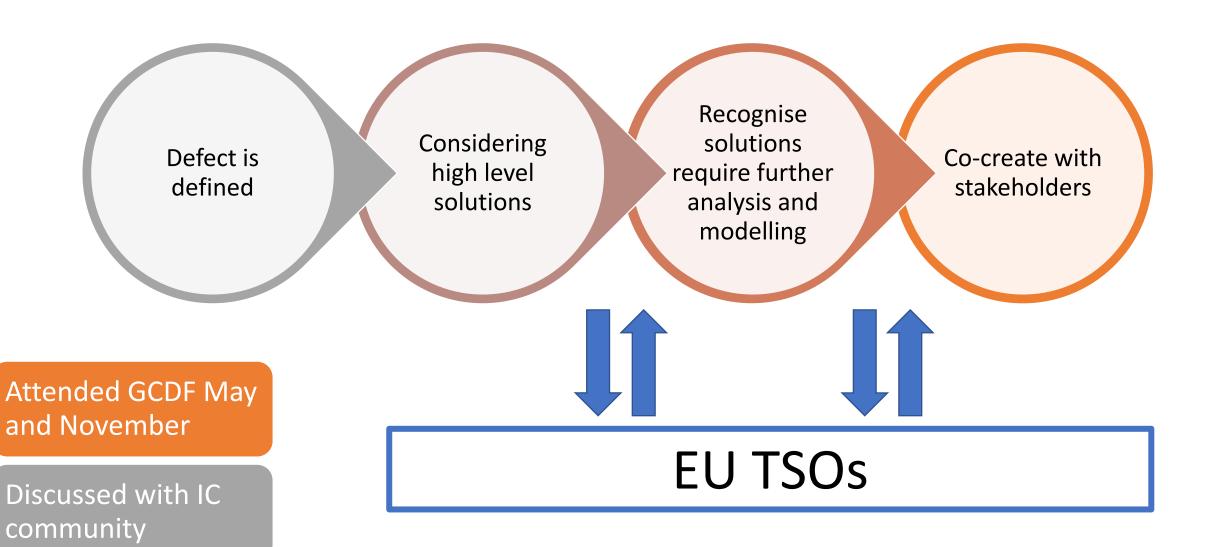
Cross border ramping is the consideration in this work. This is based on the requirements placed upon us in the letter from Ofgem.

Ramping for BMUs will be considered outside this modification

Cross –border ramping is a shared decision with the remote end EU System Operator; Therefore their involvement and coordination with this process is key to ensure a mutually acceptable solution.

ESO want to work collaboratively to achieve the right solution with the industry

Where are we



You said

Concerns from interconnectors	Suggestions from interconnectors
Deviations Who to pay costs for imbalances? This appears to be an issue at specific times of the day Could this be disproportionally costly? ESO causes imbalances on the continental side Will there be reviews into the compensation on imbalance as the long and short is assumed to 'even out?' All focus is on ramp rate restrictions Removal of flexibility of IC seems blunt Only sharing 3 examples over 4 months does not indicate a big issue Restrictions on ramping moves the problem to the IC operator due to imbalances IC are flexible plant and this could prevent us responding positively in the market Will reduced ramping have a cost to consumers?	Could dynamic ramp rates help Solutions meets a need that cannot be reached with current EA ramp management programmes Only apply ramp rate restrictions when there is a system need IC are kept financially firm for imbalance Continental TSO are consulted with and in agreement More market-based solutions- not just a code change Flows are market driven - can this drive IC being part of these balancing services? Could the IC provide frequency response?
Concerns from generators	Suggestions from generators
Windfarms can also ramp quickly in both directions and with the increase in windfarms this is also going to cause system frequency issues Should the ramping rates for windfarms be in BC1.A.1.1	We should have a joined approach for all market participants Consistency with market participants Ensure that there is the lowest cost for consumers in a competitive market

Windfarm comments are not in scope for this work- but will be shared to support future modifications

High level solutions

A number of credible solutions* have been identified that could solve the defect, in isolation or in combination, including:

- Include current bespoke IC ramping arrangements, as they are, into the Grid Code
- NGESO holds sufficient response and reserve to facilitate cross border ramping
- Develop additional tools with interconnector and EU TSOs to mitigate ramping (e.g. slow or delay)

- Changes to the GB wholesale market design to be more compatible with cross border capacity markets
- Change cross border capacity market designs
- Adjust interconnector ramp rate limits
- Dynamic ramping

^{*}Not an exhaustive list

Draft co-creation plan

Stage 1

Engagement

- Facilitate industry meetings to share update on progress (GCDF, JSEG, EU & GB TSO's)
- Raise modification at GCRP
- Start the workgroup process

Stage 2

Develop solutions

- Test initial assumptions
- Understand potential accuracy for modelling/ forecasting of cross border ramping
- Develop and co create solutions with stakeholders
- Consider the TCA work

Stage 3

Review solutions

- CBA to complete
- Assess impacts to ENCC, remote and interconnector TSO's and consumers
- Consider TCA work

Stage 4

Implementation

- Conclude code modification working group and consult with industry
- Share outputs in Industry meetings
- Share report with the authority for decision

Risks

Scope creep	Ensure that TOR are written to support ramping for HVDC interconnectors only, not for BMU's
TCA	TOR to reflect that there is work being considered for cross border balancing and how this impacts each work stream
CBA	Conducting this will be a key driver, need to ensure that this is done with support from workgroup members
Cross border	EU consideration- ensure that we have regular meetings and communications in place to ensure solution developments are shared
Modelling	Complex modelling of solutions may be required

Industry Meetings GCDF, JSEG & IC meeting

(May 21)

Workgroup Phase

(*Jan- Aug 2022)

Send to Ofgem for review and **Implementation**

(*November 2022)









Industry Meetings

GCRP - Raise modification (Dec 21)

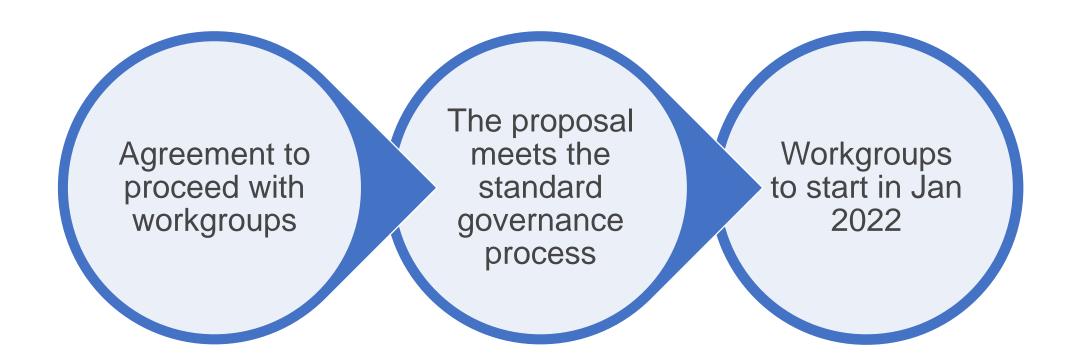


Consultation **Process**

(*August and September 2022)



Ask of panel



Critical Friend Feedback – GC0154

Code Administrator comments	Amendments made by the Proposer
Critical Friend check completed with some amendments suggested.	All amendments were accepted by the Proposer.
Minor wording changes to add clarity to the text on Modification drivers	
Improved the wording in the implementation approach and the implementation date section to provide further clarity.	Timetable updated following discussion with Code Administrator.



Timeline for GC0154 – Proposed Timeline

Milestone	Date	Milestone	Date
Modification presented to Panel	16 December 2021	Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	31 October 2022
Code Administrator Consultation (one calendar month)	·		07 November 2022
Draft Final Modification Report (DFMR) issued to Panel (5 working days)	19 October 2022	Implementation Date (5 working days)	Within 10 working days of Authority decision
Panel undertake DFMR recommendation vote	27 October 2022		



GC0154 – the asks of Panel

- AGREE that this Modification should follow Standard Governance (Ofgem decision) rather than the Self-Governance Criteria (Panel decision)
- AGREE that this Modification should proceed to Workgroup
- AGREE Workgroup Terms of Reference
- NOTE that there appear to be impacts on the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Grid Code
- NOTE the proposed timeline (draft project plan)



History and Purpose

GC0151 Fault Ride
Through- Urgent
modification to
codify FRT
requirements
following a letter
published by
ESO's Head of
Networks



WAGCM2
proposal- An
alternative was
made which
highlighted other
areas of FRT which
required
clarification



During the decision process for GC0151 OFGEM noted that WAGCM2 had merit however further scrutiny was required which wasn't possible with the GC0151 Urgent modification Timetable.



GC0155 has been raised by NGESO on behalf of Alastair Frew (WAGCM2 proposer) to allow workgroup to scrutinise FRT issues highlighted.



Purpose

This modification proposes minor changes and improvements to the existing Grid Code Fault Ride Through (FRT) requirements as a minimum but not limited to the following:

- •To clarify instances where User plant is permitted to trip where required in order to clear the fault from the transmission system
- •To amend requirements for generating maximum reactive current during faults which may be unachievable for many Generators
- •To amend post fault active power requirements to reflect that low load Generators may have greater oscillations than the requirements currently allow for
- •To provide requirements for overvoltage events following a fault

GC0155 - Legal Text Solution

- •There are proposed solutions for all four areas which require change apart from Post fault active power requirements where it was felt that the proposed solution within WAGCM2 would not resolve the issue and thus has been left open for the workgroup to find a solution.
- •The draft legal as submitted for WAGCM2 without amendment has been submitted (Annex 1) as a starting point for the workgroup but will require modification.

Panel Decision Required

 Requesting panel to approve a standard governance approach with workgroup

OFGEM GC0151 decision for WAGCM2;

A number of GCRP members noted in their voting statements that the changes to FRT requirements proposed under WAGCM2 whilst appearing beneficial, have not been fully scrutinised due to GC0151 being progressed as an urgent modification. We agree with this view, and therefore consider changes to the FRT requirements could be progressed as a separate modification should industry desire

Critical Friend Feedback: GC0155

Code Admi	nistrator comments	Amendments made by the Proposer
Minor amendm parts of the pro	ents in the Overview and some posed solution	All changes accepted by Proposer
Clarification of	Impacted Parties	Level of impact changed from 'Low' to 'Medium'
•	hrases in the 'Active Power section to read clearer	The Proposer reworded texts in this section to match the current legal text and removed the proposed solution to allow the Workgroup freedom to determine the most suitable solution



Timeline for GC0155 – Proposed Timeline

Milestone	Date	Milestone	Date	
Modification presented to Panel	16 December 2021	Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	•	
Code Administrator Consultation (one calendar month) 02 May 2022 – 02 June 2022		FMR issued to the Authority	11 July 2022	
Draft Final Modification Report (DFMR) 22 June 2022 issued to Panel (5 working days)		Implementation Date (5 working days)	Within 10 working days of Authority decision	
Panel undertake DFMR recommendation vote	30 June 2022			



GC0155 – the asks of Panel

- AGREE that this Modification should follow Standard Governance (Ofgem decision) rather than the Self-Governance Criteria (Panel decision)
- AGREE that this Modification should proceed to Workgroup
- AGREE Workgroup Terms of Reference
- 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 (draft project plan)

Inflight Modification Updates

Nisar Ahmed, Code Administrator

GC0139 update

Enhanced Planning-Data Exchange to Facilitate Whole System Planning

Good progress being made by expert group looking at legal text. No further updates from Proposer on CIM subgroup progress.

Meeting with workgroup members held on 06 October 2021 to define a plan for the modification.

Plan Agreed as follows:-

- 1) Proposer to draft terms of reference for CIM Subgroup
- Proposer to set up meeting with Dan Clarke (ENA) and Paul Hayes (Leader on CIM subgroup) to look at scope
- 3) ESO Technical Codes Team has re-circulated the draft legal text
- Group of 4 experts from Workgroup to look at producing another version of the legal text by mid November (Alan C, Proposer, & ESO)
- 5) Workgroup is currently targeting a mid-March 2022 date to conclude the workgroup and finalise the report for review by Panel.
- 6) Develop the gaps in the timeline for Panel update between now and mid-march 2022.



GC0146 update

Solutions for frequency control of Power Park Modules

This modification was submitted by Orsted on 19 May 2020 and is trying to modify the current Grid Code to ensure developers can have a more flexible way to design frequency control and how this can be implemented in the wind farms. Currently, the Grid Code allows to control the frequency at PPM level and we are asking to consider controlling frequency at BMU level as well.

- First workgroup meeting held 08 December 2021.
- Main areas for further investigation/discussion were; legal implications to the statutory instrument, consideration as to whether BM Units need to be fully defined in the Grid Code instead of just a reference to BSC as now, potential issues around cross-border connections, any consequential knock-ons that are not already listed or highlighted within the proposal.
- Timeline and Terms of Reference agreed.



Panel Tracker

Nisar Ahmed

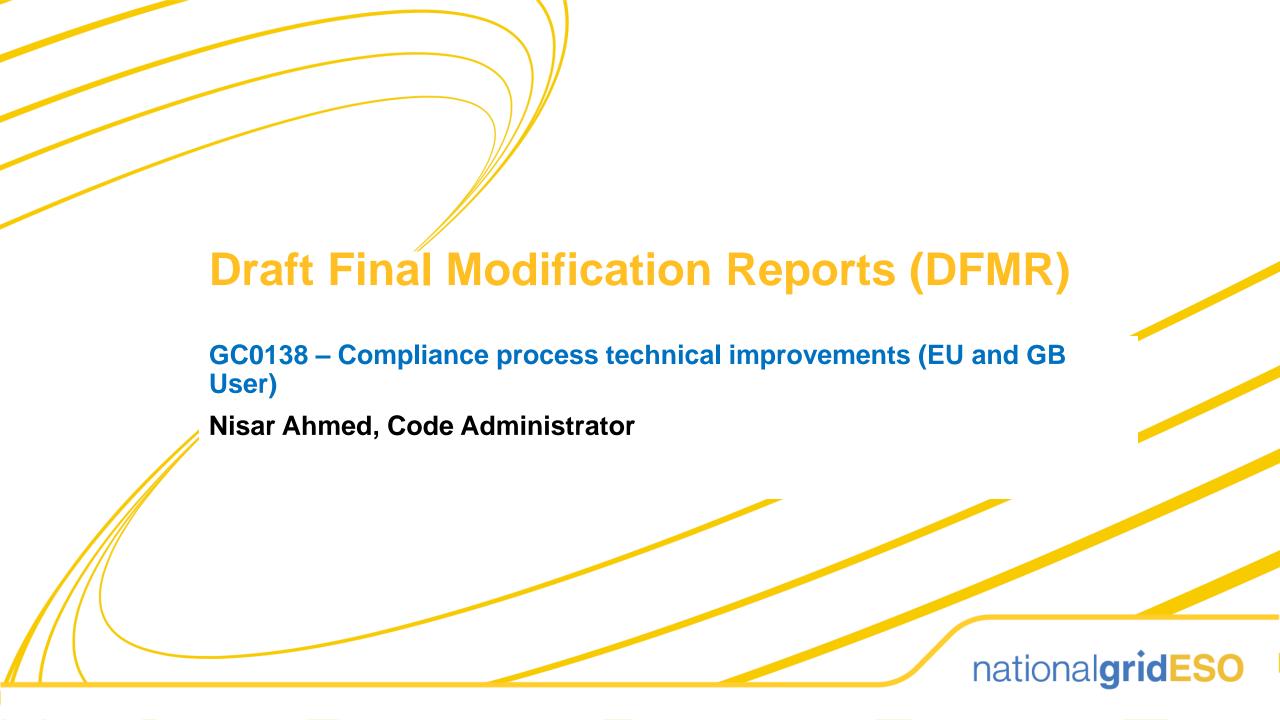




Dashboard – Grid Code (as at 08 December 2021)

Category	July	August	Sept	Oct	Nov	Dec
New Modifications	0	1 GC0152	0	0	1 GC0153	2 GC0154 GC0154
In-flight Modifications	18	19	19	17	15	17
Modifications issued for workgroup consultation	0	0	1 <i>GC0151</i>	0	0	0
Modifications issued for Code Administrator Consultation	1 <i>GC0150</i>	0	2 GC0151 GC0137	1 GC0152	1 GC0138	1 GC0153
Workgroups held	7	4	2	4	4	4
Authority Decisions	1 GC0109	1	0	0	1 GC0151	0
Implementations	0	1 GC0109 23 Aug	1 GC0134	1 GC0150	1 GC0151	1 <i>GC0152</i>

Workgroup Reports None national**gridESO**



GC0138 – Issue at DFMR stage

Issue

The Code Administrator Consultation (CAC) did not include the updated versions of Legal Text (as amended by Alan and Alastair) for ECP and OC5 documents due to an inadvertent oversight.

The Code Administrator apologies for this and we will improve our controls going forward and learn from this to mitigate any future occurrence.

What does this mean for the Panel meeting?

This means that the recommendation vote for the DFMR will now not go ahead and the asks of Panel will change. Thanks to those who had sent in votes and voting statements for GC0138 but if you have not sent in yet then there is no need to do so now.

The changes are largely typographical and minor. However, in reviewing the legal text files again, the Proposer and ESO have identified some additional typographical changes which they would like to also include.



GC0138 – Asks of the Panel

In accordance with Governance Rule 22.4(ii), the Panel will need to:

- Decide whether or not the changes are typographical and minor, in which case the matter will be directed
 to the workgroup for approval and we can have the recommendation vote in January 2022 (no
 requirement to re-issue CAC).
- 2) If Panel decide that the changes are not minor then can instruct for a further Code Administrator Consultation to be issued for a calendar month and we can have a recommendation vote in February 2022 (as would miss papers day for January unless Panel agree to accept late papers for GC0138 in January 2022).

Code Admin Recommendation: My recommendation would be to issue another Code Administrator Consultation as industry should have an opportunity to review the legal text which would be implemented.

GR.22.4(ii)

if the change required is not considered to be a typographical error then the Grid Code Review Panel may direct the Workgroup to review the change. If the Workgroup unanimously agree that the change is minor the Grid Code Review Panel may instruct the Code Administrator to make the appropriate change and the Panel Chairman will undertake the Grid Code Review Panel Recommendation Vote, otherwise for changes that are not considered to be minor the Code Administrator shall issue the Grid Code Modification Proposal for further Code Administrator consultation, after which the Panel Chairman will undertake the Grid Code Review Panel Recommendation Vote;

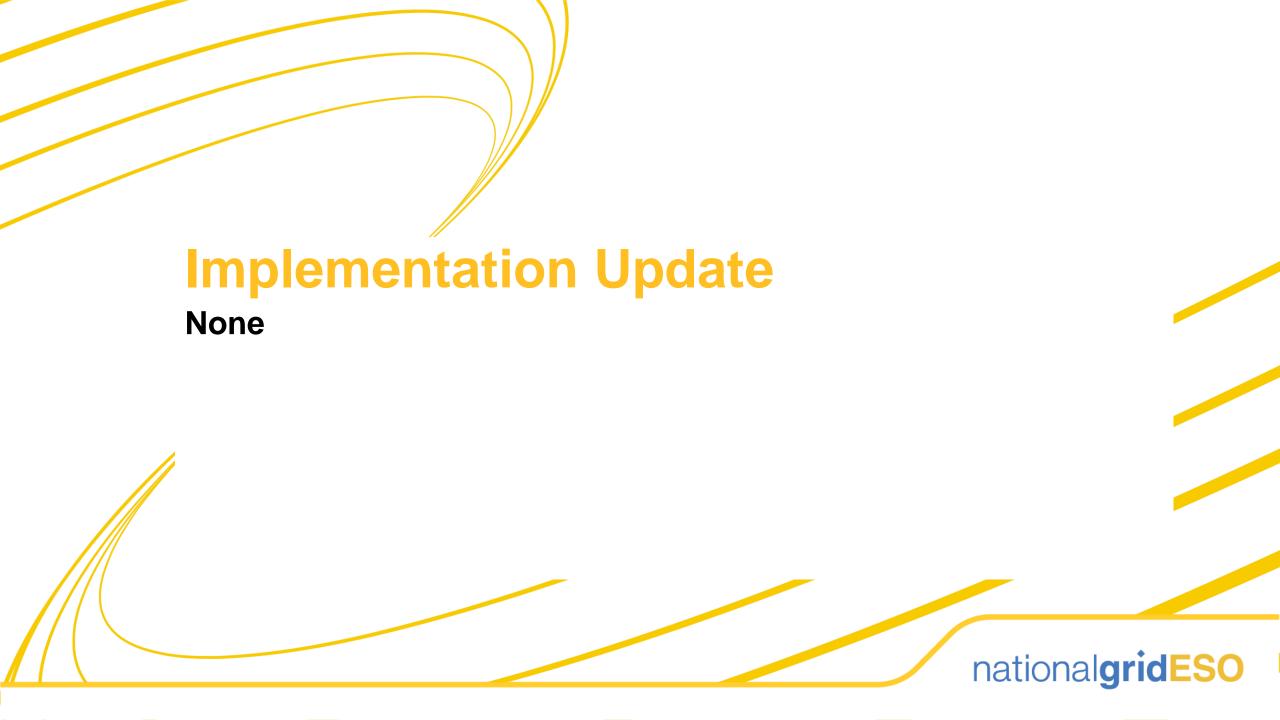
GC0138 Timeline (Panel take 5 WD for review)

Milestone	Date
Panel to review the updated Legal Text (5 Working Days)	17 Dec – 23 Dec 2021
Re-Issue CAC	29 Dec – 04 Feb 2022 (allow for Christmas Holidays and New Year break)
DFMR presented to Panel for recommendation vote	24 Feb 2022
Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	28 Feb 2022 – 04 Mar 2022
FMR Issued to the Authority	07 March 2022
Authority Decision	TBC
Implementation	Within 10 days of receiving the Authority decision

GC0138 Timeline (Panel take 1 WD for review)

Milestone	Date
Panel to review the updated Legal Text (1 Working Day)	17 Dec
Re-Issue CAC	17 Dec – 17 Jan 2022 (no allowance for Christmas Holidays and New Year break)
DFMR presented to Panel for recommendation vote	27 Jan 2022
Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	31 Jan 2022 – 04 Feb 2022
FMR Issued to the Authority	07 Feb 2022
Authority Decision	TBC
Implementation	Within 10 days of receiving the Authority decision









Rob Wilson, NGESO

Grid Code Development Forum – Previous and Next

24 November 2021

Cancelled due to no agenda items

5 January 2022

Whole System Technical Code

The WSTC Team will provide an update on the project following the closure of the first consultation.

SQSS Review

An update is due to be provided in relation to how stakeholders will be consulted on the SQSS review moving forward following the October GCDF presentation.

Electricity Restoration Standard

An update to be provided in reference to the Ofgem consultation which aims to introduce an Electricity System Restoration Standard.





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

JESG Update

Joint European Stakeholder Group meeting for December was held 14 December 2021.

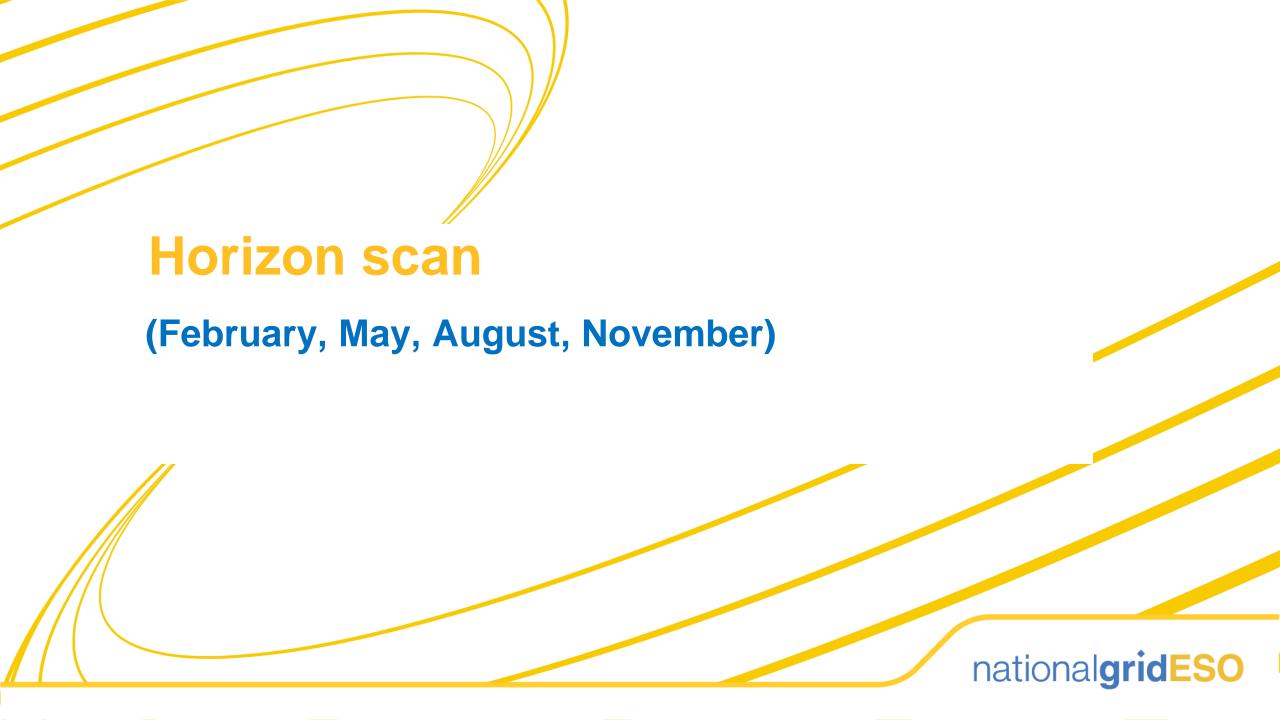
Agenda Presentation pack

The date of the next JESG meeting will be held 11 January 2022.

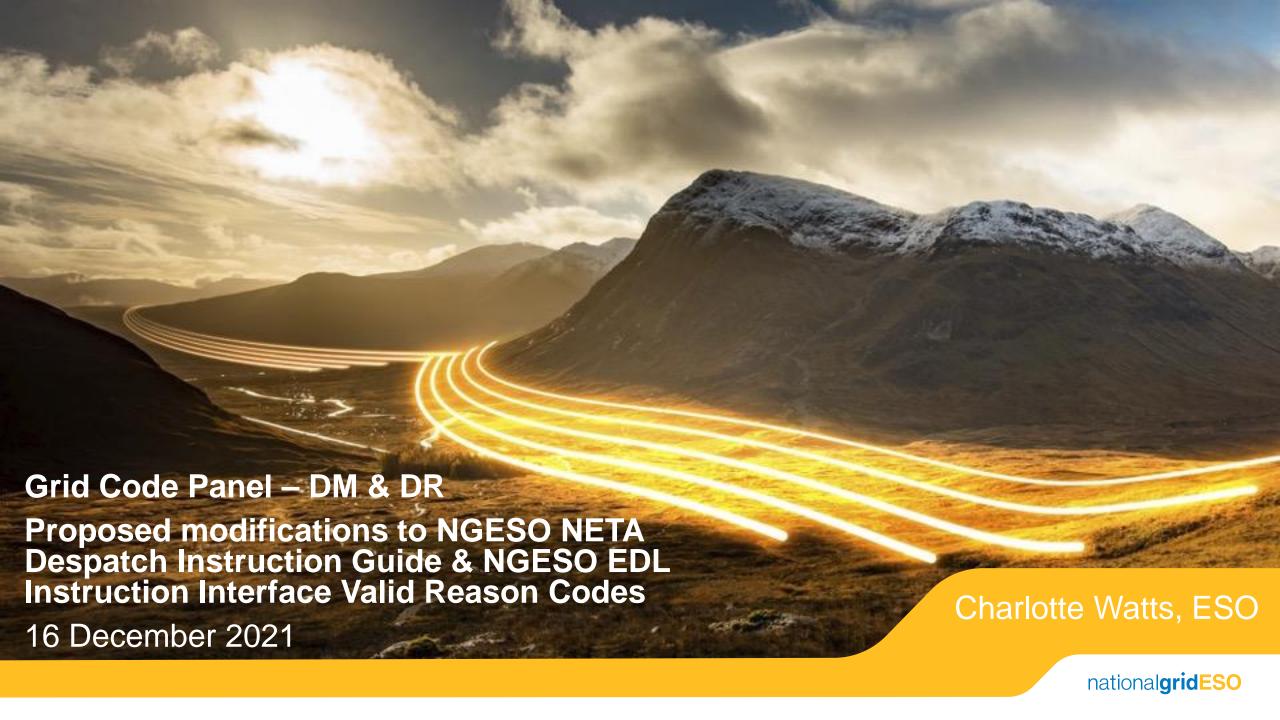








Electrical Standards DM/DR disarming instructions - new codes national**gridESO**



Background

- Dynamic Moderation and Dynamic Regulation are due to launch in spring next year
- As part of the design of the services, we have introduced the capability of disarming/re-arming units to support the operational needs of the system
- ESO will send providers an instruction to turn off and providers will only resume once ESO send a re-arming instruction
- For BM units, ESO will send reason codes to providers to disarm and re-arm
- The introduction of the new reason codes requires the following documents to be updated and approved by the Panel:
 - NGESO NETA Despatch Instruction Guide
 - NGESO EDL Instruction Interface Valid Reason Codes



Background

- EBR Article 18 DM/DR consultation ends on 15 December
- Throughout the consultation, we have engaged with providers to answer their questions on the new function
- Following the end of the consultation, Ofgem have two months to review the content
- DR will then launch in late March and DM will launch in April
- As the services are due to launch in the spring, we aim to identify the new codes early to give plenty of notice to providers and also allow time for system development

Proposed Changes

New EDL reason codes are proposed:

- One to disarm contracted response provision "DNS"
- Three to re-arm each service: "DC", "DM", "DR", and subsidiary codes to future-proof for an optional market: "DCH", "DCL", "DMH", "DML", "DRH", "DRL".

NGESO NETA Despatch Instruction Guide added paragraphs to section 4:

From September 2020, NGESO has begun a move to three new response products, Dynamic Containment (DC), Dynamic Moderation (DM) and Dynamic Regulation (DR). Initially these will be procured in a day ahead auction, and a new disarm reason code has been added to cease provision of these contracted services in real time. A new reason code has been added for each of these services to serve as a re-arm code to return to contracted provision, these codes can also be used if NGESO implements an optional market for any of these services.

- A DNS reason code will be used to indicate that a provider should cease provision of contracted response services at the Start time. Note this does not remove the grid code obligation to provide Limited Frequency Sensitive Response.
- A DC reason code will be used to indicate that contracted DC (Low and High) should resume at the Start time. If an optional market is introduced, then this code will be used to arm DC response. DCL, and DCH codes have also been added for the separate High and Low aspects of the service.
- A DM reason code will be used to indicate that contracted DM (Low and High) should resume at the Start time. If an optional market is introduced, then this code will be used to arm DM response. DML, and DMH codes have also been added for the separate High and Low aspects of the service.
- A DR reason code will be used to indicate that contracted DR (Low and High) should resume at the Start time. If an optional
 market is introduced, then this code will be used to arm DR response. DRL, and DRH codes have also been added for the
 separate High and Low aspects of the service.



None / national grideso



 GC0109 implementation update Rob Wilson

• GC0151 reporting update Rob Wilson



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

All of these have now come up with the exception of rota disconnections.



Screenshot from BMRS – 29 Aug 2021

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



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).	



Screenshot from BMRS – 3 Dec 2021

CMN & cancellation occurred:

System Warnings		
Warning Date/Time (GMT)	Warning Text	
2021-12-03 14:02	Electricity Capacity Market Notice Cancelled Posted by National Grid Electricity System Operator at 14:01 on 03/12/2021 The Capacity Market Notice originally active from 17:30 on 03/12/2021 has been cancelled from 13:36 on 03/12/2021	
2021-12-03 14:00	Electricity Capacity Market Notice Currently Active Posted by National Grid Electricity System Operator at 13:55 on 03/12/2021 Commencement time of notice: 17:30 on 03/12/2021 Circumstances that triggered notice: Margin below thresohold set out in capacity market rules Transmission Demand and Operating Margin (MW): 42518 Aggregate Capacity of BM Units expected (MW): 42472 Additional Capacity (MW): No definitive information reagrding capacity is currently available to the electricity system operator. Capacity Market participants are advised to review the System Warnings page on BMRS for potential operational warnings from the Electricity System Operator. This notice is published pursuant to Rule 8.4.6 / 11.3.5 of the Capacity Market Rules Participants are also advised to pay close attention to De-rated Margin (DRM) information on the BMRS website that will be updated 3 times (4-hour, 2 hour and 1 hour ahead) in advance of the commencement time of this Capacity Market Notice. For further information, please contact emr@nationalgrideso.com and see the FAQ at https://gbcmn.nationalgrideso.com/faq	
2021-11-26 00:25	NGESO has requested a Transmission Owner discontinue an outage within relevant Emergency Return to Service time, under STC Section C Part 2 (7). Issued by Simon Williams at 00:23 on 26/11/2021	
2021-11-26 00:23	NGESO has requested a Transmission Owner discontinue an outage within relevant Emergency Return to Service time, under STC Section C Part 2 (7). Issued by Simon Williams at 00:23 on 26/11/2021	



Thoughts?

- Getting the CMN warning onto BMRS took less than an hour
- Code requirement is 'reasonable endeavours' with a target of 15 mins
- It happened exactly at shift handover
- The ESO has no special access to Capacity Market information. We rely
 on the same emails/text alerts that any industry parties can subscribe to
- Automating this process to make it faster would cost approx. £150k
 which doesn't seem good value

GC0151 reporting update – Rob Wilson

Multiple faults:

- Storm Arwen caused 50+ transmission faults in a short timeframe including several lines that DAR'ed successfully and then retripped multiple times
- What is the best way of reporting these?
- Proposal is that we either do this as attached or by summing up the circuits that tripped and number of faults on each

Voltage waveforms:

- We are proposing to include voltage waveforms for each event taken as a RMS interpretation from the fault Contrade data
- The full data files are massive but can be supplied for any event on request
- Full waveform data is likely to be of limited value where the source is not the generator's connection point other than for information on the time-stamping and nature of the fault

Timing:

- We are proposing to put data onto the incident reporting page for the previous month
- If a Significant Incident Report is requested from a user due to a suspected FRT issue any associated data will be shared with them as soon as possible
- Sharing of real time data identifying faults on the system is a security and commercial risk and has been advised against in other contexts (eg GC0109)
- Analysing data on faults and obtaining appropriate waveform data from TOs can take some time 1.5 weeks for all of the
 Storm Arwen events
- We could share unverified data sooner but would this be of value?



Next Panel Meeting

10am on 27 January 2022 at Faraday House

Papers Day – 19 January 2022

Modification Proposals to be submitted by 12 January 2022



Close



Trisha McAuley Independent Chair, GCRP