Grid Code Structure – Connection Conditions

Background

The Grid Code describes the generic technical obligations regarding the utilisation of the GB Transmission System. The introduction of Generic Provisions and the pending Offshore Transmission regime obligations have significantly increased the volume (and complexity) of the structure which have prompted concerns from the Grid Code community regarding the transparency, practicability and longevity of the current structure. Although the concerns are applicable to the entire Grid Code, it has been acknowledged that the Connection Conditions provisions may have become increasingly complex to interpret especially from a new User perspective.

Structure: Key Requirements

It is acknowledged (and the importance therefore accepted) that the layout of the Grid Code provisions (and for the purposes of this document – the Connection Conditions in particular) is *clear*, *concise*, *transparent*, *appropriate and applicable to relevant User Groups*, *legally succinct, factual and accurate* and require *minimal Code management*.

Structure: Possible Options

There is a variety of different formats in which the provisions of Connection Conditions may be described within the Grid Code; possible options are outlined as follows:

- *Option 1 – Technical Obligations (Current Structure)*
  This format would categorise the provisions by technical obligations irrespective of User type. This approach enables all Users to refer to the same clause provision (or subsequent numerical clause) which will describe the associated technical obligation.

  ⇨ This approach minimises any duplication of provisions for a specific technical obligation and is an effective and efficient way to maintain the Connection Conditions from a Code governance and administrative perspective.

  ⇨ The integration of different classes of Users may result in the utilisation of multiple sub-clauses which may introduce complexity, a lack of transparency and clarity into the provisions from a User perspective.

- *Option 2 – User Categorisation*
  This format would categorise the provisions by User group e.g. type of User, generation type etc (this approach could also be applied to geographical location). It would enable a specific classification of Users to refer to a particular section (e.g. number reference or appendix) of the Connection Conditions.

  ⇨ This approach would enable new User categories to be effectively and efficiently assimilated within the structure. The provisions would be relevant to a particular User type, minimising the impact of complex Code modifications to unaffected Users.

  ⇨ The layout would introduce Code duplication amongst the different types of Users adding to the complexity of Code management from a governance and administrative perspective. Multi-facet Users would have to cross refer to different sections of Connection Conditions, reducing transparency for similar technical provisions. It will be important that the generic technical requirements for each type of User category are justifiable and appropriate; minimising the possibility of inadvertently introducing undue discrimination.

- *Option 3 – Code and Standards/Procedures*
  This format would specify the high-level generic requirements e.g. scope, objectives etc which were applicable to all Users within the main body of the Connection Conditions. The specific technical requirements would be described in technical standards and/or procedures which could be classified either by technical obligation, User category etc.

  ⇨ This approach would maintain the integrity of the generic technical provisions which would be applicable to all Grid Code Users. The specific provisions would be contained within separate sections, increasing the transparency and applicability of the provisions to Users.

  ⇨ The layout would require effective Code management between the main body of the Connection Conditions and the standards/procedures such that the provisions remain

in alignment. This option would necessitate a review of the existing General Condition provisions regarding the utilisation and governance arrangements for standards and would require new obligations regarding the legality and introduction of technical procedures.

⇨ It would be a significant step change in approach which would require significant effort to develop, implement and adopt. The descriptive nature of the technical provisions may not lead itself (in every circumstance) to the development of a concise, transparent technical standard/procedure (current provisions only utilised in limited specific circumstances).

Amending the Connection Condition's structure will required a comprehensive review (with appropriate resources assigned) and careful consideration as to the most appropriate approach to be adopted. Any new structure will have to fulfil the appropriate technical, governance and administrative requirements such that the format is fit for purpose within the existing licence framework.

Way Forward
National Grid invites the GCRP to

▪ Acknowledge the importance of the Grid Code remit e.g. associated licence/legal obligations and that the current structure has served well since the establishment of the Grid Code.

▪ Acknowledge that any structure would have its own particular advantages and disadvantages and it is important that the format conveys the technical requirements in a concise, transparent manner which allows (and encourages) effective and efficient Code governance.

▪ Review, provide comments and consider the consequences of the options outlined in the paper.

▪ Identify and inform National Grid of any other options which may be appropriate to consider.