

Minutes

Meeting name	Grid Code Review Panel
Meeting number	68
Date of meeting	16 July 2014
Time	10:00am – 3:00pm
Location	National Grid House, Warwick.

Attendees

Name	Role	Initials	Company
Ian Pashley	Chair	IP	National Grid
Emma Radley	Panel Secretary	ER	National Grid
Guy Nicholson	Generators with Novel Units Member	GN	Element Power
Guy Phillips	Large Generator (>3GW) Member	GP	E.ON
Campbell McDonald	Large Generator (>3GW) Member	CMD	SSE
Jim Barrett	Large Generator (>3GW) Member	JB	Centrica
Alan Creighton	Network Operator (E&W) Member	AC	Northern Powergrid
Mike Kay	Network Operator (E&W) Member	MK	ENW
Robert Longden	Suppliers	RLo	Cornwall Energy
Robert Wilson	NGET Member	RW	National Grid
Graham Stein	NGET Member	GS	National Grid
Ivan Kileff	NGET Member	IK	National Grid
Richard Lowe	Transmission Licensee (SHE Transmission) Member	RL	SHE Transmission
Neil Sandison	Network Operator (Scot.) Member	NS	SSE
Julian Wayne	Authority Member	JW	Ofgem
John Lucas	BSC Panel Member	JL	Elexon
Richard Lavender	NGET Advisor	RLa	National Grid
Gordon Kelly	Network Operator (Scot.) Alternate	GK	Scottish Power
Andy Vaudin	Large Generator (>3GW) Alternate	AV	EDF Energy
John Norbury	Large Generator (>3GW) Alternate	JN	RWE
Sigrid Bolik	Generators with Novel Units Alternate	SBo	Senvion
Garth Graham	Presenter	GG	SSE
Antony Johnson	NGET Presenter	AJ	National Grid
Henry Care	NGET Observer	HC	National Grid
Sara-Lee Kenney	NGET Observer	SLK	National Grid
Alex Thomason	Code Administrator	AT	National Grid

Apologies

Name	Role	Initials	Company
Alan Barlow	Non Embedded Customers Member	AB	Magnox
Tom Davies	Non Embedded Customers Alternate	TD	Magnox
Roger Harris	BSC Panel Alternate	RH	ELEXON
Steve Brown	Authority Alternate	SB	Ofgem
Brian Punton	Transmission Licensee (SHE Transmission) Alternate	BP	SHE Transmission
Barbara Vest	Small / Medium Generator Member	BV	Energy UK
Lisa Waters	Small / Medium Generator Alternate	LW	Waters Wye
Brendan Woods	Externally Interconnected System Operators Member	BW	SONI
Daniel Webb	Large Generator (<3GW) Member	DW	Seabank Power
Dave Draper	Large Generator (<3GW) Member	DD	Horizon Nuclear Power
Alan Kelly	Transmission Licensee (SPT) Member	AK	SPT
Alastair Frew	Large Generator (>3GW) Alternate	AF	Scottish Power Generation

1 Introductions & Apologies

3740. IP welcomed the attendees to the meeting and the apologies were noted.

2 Approval of Minutes

a) May 2014 GCRP Minutes

3741. The minutes were approved by the Panel.

ACTION: ER - Upload minutes onto the National Grid website.

3 Review of Actions

a) Summary of Actions

March GCRP Minutes

3742. **Minute 3675: Provide change-marked minutes for future meetings.** ER advised that change-marked minutes had been provided for this meeting and that this would continue for future meetings. **Action complete.**

Revision of Engineering Recommendation P28

3743. **Minute 2866: Look into sending a single invite for Workgroup members to both the GCRP and DCRP Panels.** ER advised that a consultancy firm has been found to provide a Chair. **Action ongoing.**

GC0063: Power Available

3744. **Minute 3219: Produce Lessons Learned slides.** Lessons learned to be presented after an Authority Decision. **Action ongoing.**

3745. **Minute 3219: Update draft report with further narrative, consider how to progress GC0063 and report back to future meeting.** To be discussed under item 9. **Action complete.**

GC0080: RES.

3746. **Minute 3631: Update RES guidance document after updated version agreed and publish on website.** Guidance document to be updated following conclusion of the current review, this is expected in September 2014. **Action ongoing.**

3747. **Minute 3637: Review and submit comments on the updated RES.** To be discussed under item 5. **Action complete.**

GC0083: European Transparency Regulation

3748. **Minute 3647: Circulate draft industry consultation for comments to DECC, Ofgem and Panel members.** ER advised that the consultation was published on 26 June 2014 and will close on 21 July 2014. **Action complete.**

3749. **Minute 3708: Circulate link to transparency website.** **Action complete.**

3750. **Minute 3708: Update legal text to clarify the issue of Registered Capacity vs Generation Capacity.** **Action complete.**

3751. **Minute 3708: Discuss distribution issues after the GCRP meeting, prior to issuing consultation. Action complete.**

Codes, Connections and Operations Seminar.

3752. **Minute 3685: Report back to future GCRP meetings on plans for future seminars.** ER advised that this will be carried out as and when future seminars take place. **Action complete.**

“F” Appendices in Bilateral Connection Agreements.

3753. **Minute 3693: Clarify governance of F Appendix Templates, whether they are covered by CUSC or Grid Code.** AT advised that the proformas are in the CUSC and that the applicable templates are located under ‘associated documents’ within the Grid Code page of the website. AT suggested that it is more efficient to leave the templates at their current location. GS/AT noted that the website is being reviewed and AT suggested that an email could be sent out to signpost where the material is. MK advised that it is sufficient that it is captured in the minutes. **Action complete.**

3754. **Minute 3693: Consider how best to progress the annual review templates for 2014 taking into account Panel and wider stakeholder feedback and bring back proposals.** To be discussed under Item 5.

Progress Tracker.

3755. **Minute 3730: Provide excel version of Progress Tracker for future meetings.** ER noted that an excel version had been provided for this meeting and that this would continue for future meetings. **Action complete.**

GC0050: Demand Control.

3756. **Minute 3731: Provide update on GC0050.** ER advised that GC0050 had been approved and was implemented on 1 July 2014. **Action complete.**

Compliance.

3757. **Minute 3737: Consider compliance issues and discuss at next meeting.** This is discussed after the summary of actions.

Multi-Shaft Modelling

3758. **Minute 3738: Contact original sub-group members to ask whether they wish to continue with the work.** Members have been contacted and have agreed to reinstate the group. **Action ongoing:** An issue proforma will be tabled at a Panel meeting in the near future.

b) Compliance:

(i) Application of Limited Operational Notifications (LONs).

3759. RLa presented (slides available on website) on the issues raised at the May GCRP with regard to LONs and advised what the situation is currently with regard to how the Grid Code is written. RLa reminded the group that the issues raised were:

- Should a Generator carrying out a modification be assessed as to whether they are in breach of the Grid Code before being put on a LON. Is there any discretion for NGET in the Grid Code?
- Some generators do not like to receive LONs given the wording refers to the possibility of disconnection

- Since A/10 was implemented has the number of LONs increased?
3760. RLa highlighted the relevant areas in the Grid Code regarding the issue and effect of a LON (CP8.5). JN noted that the issue for the generator in question is that it brings up potential non-compliance and he asked whether it would be possible for a generator to satisfy NGET and avoid the need to issue a LON. RLa felt that CP 8.5.1 (a) and CP 8.5.1 (b) are absolute statements, whereas (c) has some discretion as it contains the word “may”. GG believed (a) was not absolute until “NGET’s satisfaction” had been established.
3761. RLa highlighted the relevant wording in the LON template which refers to CUSC (5.4), a process that ultimately leads to disconnection, and advised that he will review the current wording of all Operational Notification including LONs to refer to the Grid Code Compliance Processes (CPs) in order to make them more customer friendly. GG said he would caution against sending a LON to the Company Secretary as suggested by RLa as it is a very important document. IP advised that he would expect that it is addressed formally to the Company Secretary, but in addition it will be sent directly to working level contacts. MK echoed GG’s point regarding being cautious as to who it is sent to. JN wondered what could be done at a working level to negate the need to issue a LON in the first place. RLa responded that the LON process, while formalised in the Grid Code, is used by NGET for monitoring Users at a working level.
3762. RLa also presented some data on the number of LONs issued which confirmed that LONs have increased since A/10 (Generator Compliance) was implemented. RLa also noted the number of derogations being sought, which occurs when a LON has been issued for more than 12 months (CP 8.11). RLa concluded that NGET does not have a lot of discretion with regard to issuing LONs for Modifications; however, they still have some discretion in whether to seek a derogation for Modifications as the 12 months limit may be extended in accordance with the Grid Code.
3763. RLa advised speaking to Ofgem at an early stage where a generator knows that they are going to exceed the 12 month period for a LON and not to wait until the end of the period, JW agreed with this. GG asked about the interaction with Requirements for Generators (RfG) and IP noted that this would need to be considered when RfG comes in.
3764. JN thanked RLa for looking into this issue.

(ii) What does compliance look like?

3765. JW explained that Ofgem had recently received a derogation request from a Generator for exemption from Frequency Response requirements under the Grid Code. This was on the grounds that the Generator suffered severe and disproportionate degradation to elements of their plant when they provided frequency response. The Generator in question subsequently withdrew the derogation request as they considered they were compliant on the grounds that they were in fact capable of providing this service, even if only for a very short period of time. To reflect the damage to the plant when providing frequency response, the price the generator bid significantly in excess of the average price and they in effect priced themselves out from providing the service. JW felt that whilst this essentially complied with the letter of the Grid Code, as they have the capability, even if only for a short period of time, it did not feel like compliance and asked for any views on this from the Panel. RLa noted that the Grid Code states that you must have the ability to comply with Frequency Response and that if you have the capability you can be tested, but the pricing is up to the generator concerned, and they can factor in any other commercial reasons into the price. So whilst NGET does not condone this behaviour because they would rather the plant is fully available for Frequency Response, they do not condemn it either because market participants are free to set their own prices and NGET would rather that the generator is available to produce MWs than not at all.
3766. GP advised that the GC and CUSC are contractual documents so there are obligations to comply with. If a generator is suffering more wear and tear when providing Frequency Response, it is not unreasonable to reflect that in their prices. GP added that every generator has to take into account the economics of their plant and integrity of the asset. JN commented that the service is essentially cost reflective and asked if is there a need to look at this in the context of developing a more comprehensive Frequency Response market. GG commented on the growth of interconnectors and also demand side response, in that the current market for Frequency Response is dominated by generators but that this may change. RLa noted that the capability requirements in the GC are generally met by new Users.
3767. CMD asked about the likelihood of success for such a derogation (ie not providing frequency response). JW responded that it depends on the specifics of the derogation and that there will be a difference if the generator is requesting a time-limited derogation, usually for a duration to fix the issue, or a lifetime derogation. JW added that Ofgem assesses each derogation individually on its merits and in accordance with its guidance document (available online). IP noted that the assumption is that the service is provided for the life of the asset.
3768. GN echoed GP's comments regarding costs. RLa observed that the situation was fully transparent to NGET and Ofgem and whilst NGET can cope with one generator doing this, if all generators priced themselves in this way then there would be a much bigger issue. IK observed that NGET may find themselves in a position where they have to call on the generator and pay a price, but as a consequence of their limitations they would only be available to provide Frequency Response for a short time. IP concluded that this is not a big issue compliance-wise but that there is a concern around the spirit of the code and associated behaviours.

(iii) Asset Replacement and Lifetime Derogations

3769. JW explained that a derogation had been received recently asking for a lifetime derogation for a replacement piece of equipment because the party in question had not ordered a compliant piece of equipment. This error seems to have arisen as a genuine mistake, the generator in question simply ordering the same (non-compliant) specification as the equipment it was replacing. As a result the generator is now non-compliant and has requested a lifetime derogation. JW advised that this creates uncertainty for the generator and causes a lot of work for NGET, Ofgem and the generator as, if granted, the derogation would likely be issued with conditions in and be periodically reviewed. JW noted that, to avoid similar instances in future, Ofgem has asked for an Open Letter to be sent from NGET reminding customers that if they are buying new equipment, to bear in mind the relevant Grid Code capability requirements that must be met. Also, lifetime derogations usually relate to the lifetime of the

equipment rather than the plant as a whole, so usually do not automatically carry forward. RLa added that the derogated condition will be against the Grid Code at the time that the generator connected and as reflected in their BCA.

3770. CMD asked if a distinction will be made for spare parts. JW responded that if a generator is replacing equipment, they need to consider what specifications that kit needs to meet. If they do not meet the required capabilities and a derogation is not requested, then they will be in breach of the Grid Code. MK felt that it seemed unfair not to carry forward derogations if you are replacing like for like kit using spares that may have been procured at the same time as the original plant. RLa advised that NGET are happy to discuss queries. CMD observed in relation to this that sometimes there is a long period between ordering and using spares.

4 New Grid Code Development Issues

a) GC0052: Assigning Detailed Planning Data (DPD) references to DPD I or DPD II.

3771. HC presented on GC0052 and noted the background and key points of the change. This is a straightforward housekeeping change to update the Grid Code for clarity. IP noted that the process is for this to go out to Industry consultation, but that it seems a lot of work for such a simple change. AT advised that other Codes have mechanisms for introducing straightforward changes that do not require such lengthy processes but that the Grid Code does not currently allow for this. MK noted that the Grid Code does not say that you have to go out to consultation. AT suggested in the absence of direction in the Grid Code, that there could be a shorter consultation period, such as one week. JL made the point that we still need to consult and people still need to read and respond, so shortening may not actually benefit anyone as it is the same amount of work to respond, whether it is one week or four. The Panel agreed to progress to industry consultation as standard for 20 working days.
3772. JN suggested explaining in the consultation why the proposed categories were not identified at the time and what has changed since 2009 when the original categories were set up. It was agreed to include more clarity as to why this change is being made now.

b) GC0086: Grid Code Open Governance.

3773. GG gave the background as to why GC0086 was raised. GG explained that the issue has been around for some time and it was felt that it was appropriate to raise this now, prior to changes being made to the Grid Code as required by the European Network Codes (ENCs), since these will lead to a significant volume of work coming to the GCRP. GG went through the table in the Issue Paper, comparing the Open Governance arrangements that the CUSC has to the Grid Code. GG added that the BSC has very similar ways of working to the CUSC.
3774. GG noted that the illustrative legal text that was provided with the paper was taken from CUSC Section 8 and also provided the justification against the Applicable Objectives to the Panel.
3775. GP added that more rigour around the process would improve the efficiency, particularly in relation to workgroups, and also that general benefits would come from Open Governance. GP added that it would be beneficial to have open governance for when the ENCs come in.
3776. MK had a concern around the cost of introducing Open Governance and that it may be more of a burden to respond to consultations as there may be more modifications proposals and also more alternatives expressed in each. MK also had a concern that

Open Governance may then be seen as appropriate for the DCRP and that there would be significant costs to provide a Code Administrator service for this.

3777. GG commented that code changes are usually brought forward after a lot of consideration and that they are often beneficial to numerous other parties. GG agreed that there is effort involved in introducing Open Governance but that the benefits outweigh this as it opens the door for other parties to raise modifications. GG felt the Grid Code is notable for its absence of Open Governance. IP noted that any party can raise an issue and National Grid on no occasion had prevented this. MK wondered what difference Open Governance would actually make, as on paper it looks different to the current ways of working, but practically it may not be very different to what happens now. CMD commented that it would make Workgroups more efficient but it will change the role of the GCRP.
3778. JN commented that his impression is that there are only a relatively small number of parties willing to engage in Workgroups so we need to be careful not to create a structure which actually makes it more difficult for Workgroups to progress.
3779. AT responded to MK's point regarding costs and noted that the biggest cost for introducing this would be the introduction of an Independent Chair. GG suggested that the benefit would outweigh the cost. AT also noted the BSC model of allowing just one Alternative for a modification in comparison to the CUSC model which allows an indeterminate number of alternative modifications. GG reminded the Panel that CUSC Alternatives still have to have majority support of the Workgroup, or the support of the Chair that it better facilitates the Applicable Objectives.
3780. CMD questioned whether all industry members would be elected under this scenario. GG responded that some parties are appointed such as the Chair and National Grid representatives, but that there would essentially be a full election process associated with introducing Open Governance.
3781. AV asked if there had been previous arguments against Open Governance. AT responded that Open Governance was raised as part of Ofgem's Code Governance Review Phase 2 and it was thought to be beneficial, but that industry resource was busy at the time. JW added that Ofgem in no way ruled against Open Governance, but had questioned whether it had been the right time to devote industry resource to this.
3782. AT noted that Section 8 of the CUSC is difficult to read and it would be better starting again for the Grid Code in terms of the legal text. JW questioned why CUSC legal text was being used as the basis for the proposition, rather than proposing changes to the 'General Conditions' text within the Grid Code. GG advised that this was to try and reduce the industry burden by using the CUSC rather than writing a whole new section. GG also noted that the industry is in a hiatus with regard to the ENCs so it would be a good time to introduce this into the Grid Code. IP agreed with AT that this needs to be progressed properly with full consideration for each aspect rather than copying the relevant CUSC legal text into the Grid Code.
3783. ER questioned how the Panel wished to progress GC0086 and it was agreed that a Workgroup was required to discuss the subject in further detail. ER noted that the Code Administrator had drafted a timetable for progression of the issue and had also drafted Terms of Reference for the Workgroup. ER ran through the list of items that had been suggested for the Workgroup to discuss and suggested that it may be sensible to put together a package of proposals for the various principles of Open Governance. By doing this, it would mean that one aspect of Open Governance would not hold back others if there were a specific issue with it, or if the Workgroup or Ofgem were not happy with one particular aspect.
3784. JB asked about Requirement for Generators (RfG) and if it is appropriate to form a Workgroup on a subject that may be superseded later on by RfG and other Network Codes.

3785. ER continued to discuss the suggested items for the Terms of Reference and the Panel discussed appeal rights in the Terms of Reference. GG felt that there is no point in discussing this in the Workgroup as only Parliament can decide on a right of appeal and the Workgroup and Ofgem will have no power to change this. AT felt that there should be an opinion on this expressed in the Workgroup Report as there is the potential for it to be highlighted to DECC in terms of the possibility of creating an appeal right. MK agreed that this should be discussed in the Workgroup as he does not understand what it is that would stop a right of appeal in the Grid Code and would like some clarity on this. GG advised that it is set out in the Statutory Instrument that the CUSC and BSC have appeal rights but there is no mention of this in the Grid Code. IP commented that a debate on this should be had in the Workgroup so that relevant information can be included in the Workgroup report.
3786. GN considered the effect on Panel Membership and suggested that the Workgroup could consider what would happen to wider issues if the Panel becomes more of a decision making body on modifications. RW advised that there has been some thinking recently regarding having a forum where issues can be brought forward for initial discussion outside of the GCRP as a result of feedback that stakeholders can find it difficult to interpret Grid Code requirements and progress issues to the point at which they can be framed for submission to the GCRP. This is broadly aligned with the potential need for a similar body subsequent to Open Governance arrangements being implemented.
3787. JN asked about the timetable, which suggested having this change in place ready for an election in 2015, which potentially conflicts with the 2 year elected term proposed under GC0074. If approved, this would delay implementation until an election in 2016. AT noted that GC0074 may need to be put on hold as it overlaps heavily with GC0086. AT advised that the GC0074 Consultation is currently ongoing and once responses have been received, it could be put on hold, but that the information obtained could help with GC0086 discussions.
3788. RL suggested that the first step is for the Workgroup to assess the perceived defect and that this may affect continuation of the Workgroup. RL noted that the Grid Code is a significant technical document and that it may not be appropriate to bring in Open Governance and particularly the aspects around Urgency and Self Governance as Modifications are usually complex and take time to develop. RL felt that the first step needed to be to understand why we need Open Governance first of all and be clear on what the benefits are.
3789. The Panel considered the timetable for progressing GC0086. AT advised that it may be beneficial for the Code Administrator to do some pre-work and possibly produce some straw man proposals for the Workgroup to assess, which would make the Workgroup more efficient. AT noted that the current timetable is ambitious and will be based on availability of Workgroup Members, but that it is suggested to hold fortnightly meetings from September which would allow the Code Administrator some time to complete the pre-work. GG noted that the processes already exist for the CUSC and BSC and that the Authority has advised that they are comfortable with Open Governance. JW commented that Authority views on open governance were for the CUSC, and so should not automatically assume to apply to different circumstances. JW commented that open governance is a matter for industry to discuss. JW clarified that open governance is not a single discrete package, but consists of many elements; it would be good to understand what the Panel consider the defects in the current arrangements are that this work would address and for the Panel to consider what elements of open governance they feel would be beneficial. JW noted that the Code Administration Code of Practice (CACOP) had been introduced into the Grid Code under CGR2 and it would be useful to include discussion of this in the Terms of Reference.
3790. ER advised that the Terms of Reference would be issued for Panel comment for two weeks and that she would send an email seeking nominations for a Workgroup. AT asked the Panel if any of them would like to nominate themselves for the Workgroup. GG, GP, MK, RL and RW advised that they would attend the Workgroup. JW agreed to request an Authority representative to attend. Other members of the Panel

acknowledged the resource commitment that this would take and noted that they would have to consider whether they could commit to a Workgroup at this time.

Action: ER to update GC0086 Terms of Reference and circulate to the Panel for comment, and to industry seeking nominations for a Workgroup.

5 Existing Grid Code Development Issues

a) GC0074: GCRP Membership

3791. It was noted that the Industry Consultation was published on 4 July 2014 and closes on 1 August 2014. ER noted that as per discussions on GC0086 above, GC0074 would be put on hold following the consultation but added that the discussions and consultation responses had been beneficial and would help feed into the GC0086 work.

b) GC0080: RES

3792. AJ updated the group on recent developments with the RES and the comments received in response to the recent consultation. AJ proposed to address the majority of comments by September 2014 and update the RES in accordance with the comments, but that a small number of the comments may take longer to deal with due to their complexity. AJ asked the Panel if they prefer to publish the RES having dealt with the majority of the comments, or wait until all the comments have been dealt with and publish afterwards, which will take longer.

3793. GG agreed that the RES could be published with the majority of comments addressed, but to publish the complex comments so that industry have transparency of what they are, rather than having to wait until they are dealt with. JN agreed that it is more important to expedite the process rather than wait for all the comments to be dealt with until the RES is published. It was suggested that it could be worth breaking down the RES document into a number of standalone documents and amending its reference in the Grid Code so that parts of it can be updated without having to review the entire document each time. AJ advised that they are looking at the internal governance process to make it simpler. CMD commented that it is a huge document to review and there should be a process for regular review.

Action: National Grid to prepare a revised proposal under the Electrical Standards procedure addressing the majority of comments received and provide further update at September GCRP.

c) Technical Appendices

3794. AJ noted that issues had been raised at the previous GCRP by SSE in relation to the Technical Appendices. AJ advised that there is an internal process for managing and reviewing the Technical Appendices. GG asked if minutes are produced from the internal meetings on this subject. AJ responded that they are but that they are not published as it is an internal meeting. GG felt that as parties are bound by the technical requirements, then there should be a right to see the minutes, agenda, actions etc for transparency. AJ was concerned about introducing a governance process having an impact on the 90 day offer process. CMD noted that these are introduced through the BCA Appendix F. JN noted that previously the issue for Generators was that Technical Appendices were only visible when they appeared in an offer to vary the BCA, but that the intention of the templates being posted on National Grid's website was to enable them to be scrutinised and challenged, if required, by parties in advance of them submitting a modification application. GG felt that having visibility of the internal meetings would give him the comfort that issues are progressing, or certain things have / have not been discussed. AJ advised that they have just introduced a change control process to give visibility of when these

documents have been changed. MK noted that they need to work to General Condition 11 of the Grid Code (Governance of Electrical Standards) which means they need to work to a specific process.

3795. AJ advised that the next major update will follow approval of the RES and the templates on the website would then be updated. Following this, the templates would then be reviewed on an annual basis. AJ added that National Grid intend to holding an industry workshop in Sept 2014 and GS noted that its purpose is to try better understand what points are important to Users. IP suggested that GG's point regarding transparency of meeting minutes could be discussed at the workshop.

Action: Note GG issues and discuss at September workshop to work out the best way to take forward.

6 Workgroups in Progress

a) GC0048: ENC – Requirements for Generators

3796. RW advised that monthly meetings have been scheduled and that the next meeting is planned for September which will be used to catch up on developments and look at how the work will be planned plus key topics such as banding thresholds and national parameters.

7 Workgroup Reports

3797. None

8 Industry Consultations

a) GC0061: Electricity Supply Emergency Code

3798. RW advised that a consultation has been developed based on an issue paper which was discussed at the November 2012 GCRP which would modify the Grid Code to clarify the role that would be taken by Network Operators should the Government invoke ESEC to deal with a prolonged electricity supply emergency. RW advised that the consultation would be issued shortly given that a final version of ESEC has now been provided by DECC, but that implementation will not be possible until it has achieved ministerial approval which is anticipated at the start of August. DECC want all arrangements to be in place for this winter. GG highlighted some errors that he had picked up in the consultation. Firstly in paragraph 3.2 it needs to say 'direction' issued by the Secretary of State. Also it should refer to directions issued to each DNO as it currently implies otherwise. GG also asked RW to check the legal text in relation to OC6.1.5 regarding reference to the Energy Act 1976, to make sure that this should not be the Electricity Act. JN suggested that this paragraph seems a bit vague and it could be more specific on NGET's role. RW invited JN to provide suggested changes to the draft legal text. GG advised that he would send through his comment to RW via email.
3799. MK noted that the DCRP was under pressure to consult on a similar ESEC issue and wondered if there is there was some way to have a joint Grid Code and Distribution Code consultation. RW noted that there is not much time to get this in for winter so he would like to issue the Grid Code consultation next week.

b) GC0077: Suppression of SSR from Series Compensators.

3800. GS advised that this will be published by Monday 21 July 2014 for 20 working days.

c) GC0083: European Transparency Regulation

3801. RW advised that the consultation opened on 26 June and closes on 21 July 2014.

9 Reports to the Authority

a) GC0063: Power Available

3802. RW noted that a consultation had been carried out and that NGET have been doing some further work following responses received and also the discussion at the May GCRP. Points raised included a lack of clarity in identification of the original defect, and stakeholder concerns regarding retrospectivity and costs, plus a lack of consensus in the chosen solution. The draft report is being looked at to ensure that it is suitable to be sent to the Authority and that this would allow the Authority to come to a decision. RW noted that the report will be discussed at a meeting of the Renewable UK Generator Services forum on 16 Sept. GP wondered if the Workgroup should hold another meeting to review the industry comments. RW felt that the majority of the views from the consultation had been taken into account and would be expressed in the final report, but that a final Workgroup meeting would be useful in helping to agree the content of the final report and reflect on any developments, and that he would rather have as much engagement as is needed to ensure that this is done properly.

b) GC0042: Information on Small Embedded Power Stations and Impact on Demand

3803. GS advised that GC0042 had been submitted to the Authority on 3 July 2014 with recommendations to make changes to the Grid Code and the Distribution Code.

c) GC0076: Rapid Voltage Changes

3804. GS noted that further work is being carried out and there is a possibility that another consultation may be required.

10 Progress Tracker

ER noted that pp14/42 was circulated with Panel Papers.

11 Pending Authority Decisions

3806. **GC0035: Frequency Changes during Large Disturbances and their Impact on the Total System** – JW advised that Ofgem are hoping to publish their decision on Friday 25th July 2014.

12 Standing Items

a) European Network Codes

3807. IP noted that pp14/43, the ACER update on European Network Codes, was circulated to the Panel.

b) Joint European Standing Group

3808. IP noted that pp14/44, the JESG Headline Report, was circulated to the Panel.

c) ECCAF

3809. IP noted that pp14/45; the ECCAF Headline Report was circulated to the Panel.

13 Impact of Other Code Modification or Developments

3810. A codes summary, pp14/46, was circulated to the Panel.

14 Any Other Business

3811. ER noted that a paper on consequential changes to the codes regarding EMR had been circulated to the Panel (pp14/47) following publication of the Final Policy Decision on 23 June 2014, and that this included minor changes to the Grid Code. ER advised that these changes are likely to be directed by the Secretary of State on 1 August 2014 and the codes will be updated to implement the changes at the same time. JN suggested that, for accuracy, "party to the Grid Code" be substituted with "subject to the Grid Code" (para 48.d). An email to confirm the changes would be sent out after the Direction is made.

3812. JW explained why a decision on GC0035 took longer than the 25 day KPI, because Ofgem had to consult with the HSE as it is an obligation for Ofgem on modifications that may tangibly have safety implications. JW suggested that going forward, it would be useful for workgroups developing mods with a safety impact to engage with the HSE early in the process as well as seeking HSE views on the final proposal. This has the benefits that the Ofgem approval process is quicker, and that any HSE concerns and recommendations can be addressed early in the development rather than only being discovered at the approval stage. The Panel queried where the obligation for Ofgem to consult with the HSE sat and JW advised that he would circulate the link to the relevant act.

Action: JW to circulate link to Act which obligates Ofgem to consult with HSE

3813. ER highlighted an item of AOB regarding the Code Administration Code of Practice (CACOP) and explained that it was developed under Ofgem's Code Governance Review in order to facilitate transparency and consistency in the code modification processes and to protect the interests of small market participants and consumers. ER went on to note that Principle 4 of the CACOP states that the CACOP will be reviewed periodically, and therefore the Code Administrators have been discussing recently how that review is carried out. Part of the process is to ask Code Panels for any input or concerns ahead of the review, which will be carried out in September this year and to seek opinions as to how industry is engaged with this process. ER advised that the CUSC Panel had suggested that an open letter is circulated to CUSC Parties in order to seek views on the CACOP. ER asked the GCRP if they could feed back any views on the CACOP or how industry could be engaged, and that this information would then be fed back to the Code Administrators ahead of their review meeting in September.

Action – ER to circulate link to CACOP and seek input from Panel Members to provide to the Code Administrators' review meeting.

15 Next Meeting

3814. The next meeting is planned for 17 September 2014 at National Grid House, Warwick.