

GC0148: Implementation of EU Emergency and Restoration Code Phase II

9 March 2023

Online Meeting via Teams

WELCOME





Send Back Process

Milly Lewis –ESO Code Administrator

GC0148 – Governance Rules for Send-Backs and Panel Asks

GR.22.11 If the **Authority** determines that the **Grid Code Modification Report** is such that the **Authority** cannot properly form an opinion on the **Grid Code Modification Proposal** and any **Workgroup Alternative Grid Code Modification(s)**, or where the **Grid Code Modification Proposal** and/or any **Workgroup Alternative Grid Code Modification(s)** constitutes an amendment to the **Regulated Sections** of the code, where the **Authority** requires an amendment to the **Grid Code Modification Proposal** and/or any **Workgroup Alternative Grid Code Modification(s)** in order to approve it, it may issue a direction to the **Grid Code Review Panel**:

- (a) specifying the additional steps (including drafting or amending existing drafting associated with the **Grid Code Modification Proposal** and any **Workgroup Alternative Grid Code Modification(s)**, revision (including revision to the timetable), analysis or information that it requires in order to form such an opinion; and
- (b) requiring the **Grid Code Modification Report** to be revised and to be resubmitted.

GR.22.12 If a **Grid Code Modification Report** is to be revised and re-submitted in accordance with a direction issued pursuant to GR.22.11, it shall be re-submitted as soon after the **Authority's** direction as is appropriate (and in the case of an amendment to the areas set out in table 1 of the GR.B annex which details the **Regulated Sections** of the code within 2 months), taking into account the complexity, importance and urgency of the **Grid Code Modification Proposal** and any **Workgroup Alternative Grid Code Modification(s)**. The **Grid Code Review Panel** shall decide on the level of analysis and consultation required in order to comply with the **Authority's** direction and shall agree an appropriate timetable for meeting its obligations. Once the **Grid Code Modification Report** is revised, the **Grid Code Review Panel** shall carry out its **Grid Code Review Panel Recommendation Vote** again in respect of the revised **Grid Code Modification Report** and re-submit it to the **Authority** in compliance with GR.22.4 to GR.22.6.

February 2023 Panel agreed next steps following send-back on 24 January 2023:

They **NOTED** that Ofgem are asking the Final Modification Report and Legal Text to be updated and resubmitted.

They **AGREED** that this needs to be assessed by a Workgroup.

They **AGREED** the Workgroup's indicative Terms of Reference.

They **AGREED** (following the assessment by the Workgroup) that a Code Administrator Consultation is needed to be run before it is re-presented to Panel for Recommendation Vote



Objectives and Timeline

Milly Lewis – ESO Code Administrator

Timeline for GC0148 as at 02/03/2023

Milestone	Date	Milestone	Date
Workgroup 14 – agree timeline, review terms of reference, agree what elements of legal text need to be amended and how best to do so	9 March 2023	Panel undertake DFMR recommendation vote	25 May 2023
Workgroup 15 – finalise Legal Text, impact analysis, review output and ensure we have addressed all terms of reference	15 March 2023	Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	29 May – 2 June 2023
Update on how we have addressed the Terms of Reference to Panel – not for Panel approval	30 March 2023 (Papers – 22 March 2023)	Final Modification Report issued to Ofgem	5 June 2023
Code Administrator Consultation	3 April 2023 – 3 May 2023	Ofgem decision	TBC
Draft Final Modification Report (DFMR) issued to Panel	17 May 2023	Implementation Date	



Indicative Terms of Reference

Milly Lewis –ESO Code Administrator

GC0148 – Indicative Terms of Reference for Send Back

- Identify and clarify the issues regarding critical tools and facilities affecting parties (specifically aggregators) to comply with the provisions in the NCER.
- Propose solutions, and the associated legal text, to resolve these issues.
- Review the proposed changes to ensure there are no unintended impacts to the previous solution.



Discuss how to address the indicative Terms of Reference

Milly Lewis –ESO Code Administrator

Identify and clarify the issues regarding critical tools and facilities affecting parties (specifically aggregators) to comply with the provisions in the NCER.

GC0148, aims to implement the outstanding Articles of the EU Emergency and Restoration Code into UK law which was understood to have an implementation date of 18 December 2022. However; when translated into UK law through Statutory Instrument SI 533/2019 it did not include a date for the requirement for parties to have to meet the critical tools and facilities requirements.

- Articles 15(5) – 15(8) – (low frequency demand disconnection)
- Article 41 – (Communications Systems)
- **Article 42(1)(2) and (5) – (Critical Tools and Facilities).**

Article 42(2) (Critical Tools and Facilities) references E&R Art 23(4) and SOGL Art 24. An SGU under the EU Emergency and Restoration Code is defined under Article 2(e) and includes an aggregator and therefore it is understood that the requirements of E&R would apply to this category of User.

Following GC0156 Workgroup discussion in November 2022, the ESO informed Ofgem that the Workgroup had been made aware that a number of Virtual Lead Parties / aggregators would be unable to satisfy this requirement. This had not been highlighted through the Standard Governance Route Workgroup meetings or industry consultants as part of the GC0148 modification.

Critical Tools and Facilities	<p>Apparatus and tools required in relation to Black Start:</p> <p>In the case of The Company include, but are not limited to:</p> <ul style="list-style-type: none"> i) Tools for operating and monitoring the Transmission System including but not limited to state estimation, the Balancing Mechanism, Load and System Frequency control, alarms, real time system operation and operational security analysis including off line transmission analysis; ii) The ability to control, protect and monitor transmission assets including switchgear, tap changers and other Transmission System equipment including where available auxiliary equipment and to ensure the safe operation of Plant and Apparatus and the safety of personnel; iii) Control Telephony systems as provided for in CC.6.5.1 – CC.6.5.5 and ECC.6.5.1 – ECC.6.5.5; iv) Operational telephony as provided for in STCP 04-5; and v) Tools and communications systems to facilitate cross border operations. <p>In the case of Generators, HVDC System Owners, DC Converter Station Owners, Defence Service Providers, Restoration Service Providers and Virtual Lead Parties:</p> <ul style="list-style-type: none"> i) Tools for monitoring their Plant and Apparatus; ii) The ability to control, protect and monitor their Plant and Apparatus necessary for Black Start including as applicable primary Plant, switchgear, tap changers and other auxiliary equipment and to ensure the safe operation of Plant and personnel; and iii) Control Telephony as provided for in CC.6.5.1 – CC.6.5.5 and ECC.6.5.1 – ECC.6.5.5. <p>In the case of Network Operators:</p> <ul style="list-style-type: none"> i) Control room Apparatus and tools for monitoring their System including but not limited to, alarms, real time system operation and operational security analysis including off line network analysis; ii) The ability to control, protect and monitor those assets necessary for Black Start including switchgear, tap changers and other network equipment including where available auxiliary equipment and to ensure the safe operation of Plant and personnel; and iii) Control Telephony as provided for in CC.6.5.1 – CC.6.5.5 and ECC.6.5.1 – ECC.6.5.5. <p>In the case of Non-Embedded Customers:</p> <ul style="list-style-type: none"> i) Tools for monitoring their System including but not limited to, alarms and real time system operation; ii) The ability to control, protect and monitor those assets necessary for Black Start including switchgear, tap changers and other network equipment including where available auxiliary equipment and to ensure the safe operation of Plant and personnel; and iii) Control Telephony as provided for in CC.6.5.1 – CC.6.5.5 and ECC.6.5.1 – ECC.6.5.5.
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CC.7.10 Obligations on Users in respect of Critical Tools and Facilities

- CC.7.10.1 In addition to the requirements of CC.6.5.1 – CC.6.5.5 and CC.6.5.8(b), **The Company**, each **GB Code User** and **Restoration Service Provider** shall ensure they have the appropriate **Critical Tools and Facilities** necessary to control their assets for **Black Start**, from their **Control Point** or **Control Centre** as appropriate for a minimum period of 72 hours (or such longer period as agreed between the **User** and/or **Restoration Service Provider** and **The Company**) following a **Total Shutdown** or **Partial Shutdown**.
- CC.7.10.2 In satisfying this requirement, **The Company** and **GB Code Users** in respect of their **Critical Tools and Facilities** shall ensure as far as reasonably practical that they have adequate control equipment redundancy in place so that in the event of a failure of one or more components of the control system its function is unimpaired.
- CC.7.10.3 Each **GB Code User** and **Restoration Service Provider** will report on the results of their management and testing for their **Critical Tools and Facilities** on request by **The Company**.

Propose solutions, and the associated legal text, to resolve these issues

It has been confirmed Workgroup discussions and conclusions

Can	Cannot
<ul style="list-style-type: none">- Provide more clarity on what is required to meet the obligations- Amend the legal text to support this clarity (if required)	<ul style="list-style-type: none">- Instruction for parties to seek derogations- Alter the end solution

Review the proposed changes to ensure there are no unintended impacts to the previous solution

Caution needs to be taken to ensure that any changes which are made to not impact as the Send Back letter states

“As the vast majority of the Proposal is fit for purpose, taking into account the new information regarding aggregators would be consistent with the direction and intent of the Proposal. For these reasons we have decided that send back, rather than rejection, is the most appropriate avenue to ensure the legal text is updated to account for the new information.”



Any Other Business



Next Steps