

Headline Report

Meeting name	European Code Coordination Application Forum (ECCAF)
Meeting number	3
Date of meeting	27 March 2014
Location	Elxon, 350 Euston Road, London.

Please also refer to the slide pack which has been published¹ with this headline report, as material is not repeated in this headline report.

1. Attendees

ECCAF Members

Barbara Vest	Energy UK	Chair
Paul Wakeley	National Grid	Technical Secretary
Peter Bolitho	Waters Wye	BSC Panel
Garth Graham	SSE	CUSC Modification Panel
Mike Kay	ENWL	Distribution Code Review Panel
Jim Barrett	Centrica	Grid Code Review Panel
Joseph Dunn	SPT	STC Panel
Fiona Navesey	DECC	
Abid Sheikh	Ofgem	
Carole Hook	National Grid	

Other Attendees

Mark Copley	Ofgem	Observer
Rupika Madhura	Ofgem	Observer
Sarah Carter	PPA Energy	Consultant for Distribution Code

Apologies

Steve Wilkin	Elxon	BSC Code Administrator
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2. Review of Action Log

Please refer to the Action log at the end of this Headline report (Page 4).

3. Network Code Status and Comitology Update

Recent notable developments with Network Codes in recent months are summarised as follows:

- **RFG.** The French Government has made a number of significant change proposals to the Commission.
- **CACM.** The Network Code has completed the Commission's inter-service consultation, however, they are some outstanding issues. The Network Code is likely to be delayed by a number of weeks.

¹ Please refer to: [http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Standing-groups/European-Code-Coordination-Application-Forum-\(ECCAF\)/](http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Standing-groups/European-Code-Coordination-Application-Forum-(ECCAF)/).

- **Balancing.** ENTSO-E is currently considering the ACER review which has asked for re-drafting of the Network Code in a number of areas to make it consistent with the framework guidelines.
- Other Network Codes continue to progress through various stages of development:
 - Pre-comitology: DCC, OS, OPS, LFCR;
 - ENTSO-E redraft after ACER Opinion: FCA;
 - ENTSO-E drafting: HVDC.

Further information can be found on the JESG website².

4. Code Mapping Working Group Terms of Reference

Arising from ECCAF Meeting 2, the Code Mapping Working Group (CMWG) - an ECCAF Subgroup - has been formed to consider the mapping of the location of the requirements from the Network Codes in to the GB Codes.

The relationship between the CMWG, ECCAF and the rest of the ECCAF process is summarised in the ECCAF work process, available to download from the ECCAF website¹. The Terms of Reference for CMWG were approved by ECCAF, and a copy has been published on the ECCAF website¹.

5. Report from CMWG on RFG Article 1 – 23

The CMWG met on 12 March to start the mapping of RFG to the GB Codes. The highlights were as follows:

Headline summary from CMWG:

- Majority of RFG technical requirements map to either Grid Code or D-Code;
- Some consequential changes to CUSC may be required, if RFG requirements are specified in Bilateral Contracts (particularly an issue for larger generators);
- The table produced by CMWG will be published on the ECCAF website.

Sarah Carter from PPA Energy, on behalf of the ENA, gave a presentation on options for structuring the D-Code suite of documents in light of the RFG requirements. It was noted in particular that the Type A generator range (800W – 1MW) covers a large number of different types of installations within GB. The approach proposed a suite of documents for 'domestic', then duplicate requirements in to B, C and D generators as being the most user friendly solution. The issues around duplication are not insurmountable. By having subsections for Specification, Connection & Operation this would allow the Grid Connection Network Codes, and other Network Codes to be used in this framework. This topic is an ongoing topic of discussion by the GCRP/DCRP workgroup.

There were three categories of outstanding issues to report:

Issues to be considered by the DCRP/GCRP Workgroup (for information to ECCAF)

- How D-Code/G-Code are structured going forwards:
 - Need to ensure that if requirements are in two different GB Codes they are consistent / equivalent;
 - Need to be clear where requirements for types of generators are located, i.e. a Type D at 132kV will be distribution connected in England and Wales and transmission connected in Scotland;
 - How do we interpret "Relevant Network Operator" – this may mean that Type D requirements are different depending on if they are in England and Wales or Scotland at the same voltage 132kV.
- Any references to Article 4(3) need to refer to a process in the relevant GB Code and refer to the GB Governance process, with the obligation placed on the relevant TSO or DNO as per the text³.

² <http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Standing-groups/Joint-European-standing-group/>

³ It is noted that a number of ECCAF members would like to re-examine the governance process for the Grid Code and D-Code in light of the arrangements used in other GB codes such as the CUSC or BSC.

Issues to be considered by ECCAF

These are issues to be considered and advanced by ECCAF. The three issues are summarised in the following table:

Issue	ECCAF Treatment
Global issue of treatment and handling of definitions. Queries over GB vs (multiple) EU definitions	Definitions are an ongoing area of work for Commission / ENTSO-E / ACER so will park for now, to be become an ECCAF focus topic when more clarity is gained from the first Network Code to progress through Comitology as to how definitions will be handled on a pan-European level. ENTSO-E does hold a common repository of definitions in their meta-data repository ⁴ .
Article 11(4) Type D general system management requirements. At present written like central dispatch and it is not clear how they work in principle.	Drafting in ongoing and these articles may be affected. ECCAF will return to these articles once further clarity has been gained in the drafting.
Article 18. Concern over Connection Point and how this applies in GB.	

Issues to be flagged to DECC / Ofgem (for information to ECCAF)

- Article 3(2), Article 3(3). Legislation required giving NRA the necessary powers. Licence changes to oblige others;
- Article 3a(1): Secondary legislation to make requirements enforceable?;
- Article 3a(2): Obligation on DECC/Ofgem;
- Article 3a(3): Legislation required to give NRA the necessary powers;
- Article 3a(4): Generators in construction / contract: Ofgem to write / lead a one-off process to consider someone an 'existing' generator;
- Article 4(1): Regulatory Aspects. Are changes required to modify GB Code objectives to match European objectives?;
- Article 5: Cost recovery. Ofgem to consider overall approach;
- Article 6: Confidentiality. Legal advice required. Broader issues for GB under the EU Network Codes;
- Article 14(3): Relevant Network Operator: If obligation are placed on TSOs at 132kV enforcement mechanisms may be required in GB;

6. Presentation on the future of GB Codes (Garth Graham)

Garth Graham (SSE) provided a presentation on the future of GB Codes in light of the Network Codes. Garth stated that in order to ensure a level playing field for GB market parties in Europe that existing GB requirements should not apply by default – or else they may be at a competitive disadvantage.

There are various views on this topic based on the interpretation of the European Regulations in particular Article 8 (paragraph 7) and Article 21 of Regulation (EU) 714/2009. The various positions are largely based on the different definitions of 'cross border impact', which Mark Copley noted has never been well defined.

NGET interpretation is that the Network Codes, by design, deal with issues of cross-border impact. Therefore, issues not covered by the Network Codes do not have cross-border impact and can therefore, under Regulation 714/2009, be permitted to be covered by national requirements.

Mark Copley summarised that the Network Codes and the GB Codes must co-exist. The Network Codes were never envisaged to be all encompassing. His view is that where there is conflict in requirements the GB requirements will need to be updated, beyond this only changes by exception would be made where a case were proven that there is a cross-border trade impact. In particular, it must be ensured that GB compliance is achieved in a proportionate and timely manner.

⁴ <https://emr.entsoe.eu/glossary/bin/view/GlossaryCode/GlossaryIndex>

7. Next Meeting

- The next meeting of ECCAF will be held on Tuesday 29 April.
- It is also planned to hold the Code Mapping Working Group on the CACM Network Code on the same day.
- Information on both meetings will be circulated shortly.

8. AOB

There was no further business

ECCAF Action Log

ID	Action	Lead Party	Target Date	Status	Update
2/1	Do principals in Network Codes need to be transcribed in to the GB Framework	FN	March 2014	Closed	They would need to follow a legal process to make them binding in GB. The DECC view was that they would somehow be inserted into the GB codes.
2/2	Arrange session with Code Administrators (and Stakeholder) on initial mapping of RFG and CACM.	PW	March 2014	Open	RFG Meeting held on 7 March and 27 March CACM Meeting to be scheduled for April 2014.
3/1	Ensure the Terms of Reference for the CMWG are circulated to the Code Administrators and published on the website	PW	April 2014	New	
3/2	Share any intelligence about how other member states are approaching demonstrating compliance, through information gained from other government departments, regulators or parent companies.	DECC / Ofgem / those stakeholders with European parent companies	April 2014	New	

ECCAF Risks and Issue Log

Issue No	Source	Risk / Issue	Further information
1.	JESG	Implementation: Can areas of the GB Network Code be changed to comply with the ENC's be modified through the normal GB governance arrangements, provided it does not affect compliance with the ENC's?	Governance arrangements of GB Codes are not expected to change by implementing the ENC's. However, GB must demonstrate compliance to the ENC's or risks being found in breach and fined.
2.	JESG	How do the definitions in the Transparency Regulation, expected to become law as an Annex to Regulation 714/2009 prior to any Network Code, interact with those in the Network Codes? Do the definitions in the Transparency Regulations have primacy over those in the Network Codes?	Once published in the OJEU, the definitions became law. The Transparency Regulation have been published are Regulation 543/2009 amending Annex I of Regulation 714/2009. The interaction of future definitions is not yet fully understood.
3.	JESG	How will the changes to the GB Framework be made as a result of the Network Codes, for example, will existing structures (panels etc.) be used where possible, or will third package powers be used to make changes via the Secretary of State?	It is expected that existing standard Code Governance will be used where possible, however, Ofgem have powers to make changes to the GB Codes to ensure compliance with European legislation.
4.	JESG	Further details of the modification process for GB Codes as a result of the ENC's need to be defined, for example, how will raise modifications, can alternatives be proposed etc.	Noted.
5.	ECCAF	The industry may not have sufficient resource to make the scale of the changes required to the GB Codes.	This is a high impact risk, and all industry parties should consider how application can be done in the most efficient method possible to reduce the burden where possible.
6.	ECCAF	Definitions. Handling of definitions in GB where the European set keeps changing.	How will the GB Codes handle the changing landscape of European definitions. A mechanism to refer to a central European set of definitions may be required.

Useful Links

GB Codes: Text and Panel Websites

GB Code	Document	Review/Modification Panel
BSC	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/	http://www.elexon.co.uk/group/the-panel/
CUSC	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Connection-and-Use-of-System-Code/	
Grid Code	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Grid-Code/	
D-Code	http://www.dcode.org.uk/the-distribution-code/	http://www.dcode.org.uk/dcode-review-panel/
SQSS	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/System-Security-and-Quality-of-Supply-Standards/	
STC	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/System-Operator-Transmission-Owner-Code/	
DCUSA	http://www.dcusa.co.uk/Public/DCUSADocuments.aspx?s=c	http://www.dcusa.co.uk/Public/CPs.aspx