

<b>DCRP_19_04_02</b>	<b>Subject:</b>	<b>Grid Code Review Panel</b>
	<b>Author:</b>	<b>Alan Creighton</b>
	<b>Date:</b>	<b>25 April 2019</b>

All

Below is my DAR from the Grid Code Review Panel meeting. Key points to note include:

- GC0114: System Operation Guideline: Prequalification Processes – decision expected within 3 weeks.
- GC0118: Modification to the Grid Code to accommodate the recent Distribution Code modification to Engineering Recommendation P28 – Voltage fluctuations and the connection of disturbing equipment to transmission systems and distribution networks in the UK– decision expected tomorrow (26 April)
- GC0127: This modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the System Defence Plan (SDP). There are uncertainties here re who the obligations fall to (which SGUs) and if there are SGUs embedded in Distribution networks, there could be a need for an associated Dcode modification. NGESO to provide clarity on who it applies to before the next meeting.
- GC0128: This modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the System Restoration Plan (SRP). The emphasis is on who is the Frequency Leader (not a DNO), and the implication for DNOs seems to be in the requirement to be more transparent on the demand that would be offered up by the DNOs, and the behaviour of embedded generation in the demand group

Other interesting snippets highlighted in yellow

Regards Alan

<b>Attendees:</b>		<b>Apologies:</b>	
<b>Panel Members</b>		<b>Panel Members</b>	
Trisha McAuley	Code Admin Chair	Colm Murphy	NGESO
Alan Creighton	DNO	Steve Cox	DNO
Emma Hart	NGESO Secretary	Greg Heavens	NGESO (Observer)
Gurpal Singh	Ofgem		
Graeme Vincent	DNO (Alternate)		
Alastair Frew	Generator Drax		
Matthew Bent	NGESO Code Admin		
Rob Wilson	NGESO (Alternate?)		
Rob Longden	Supplier		
Joe Underwood	Generator EHP		
Chris Smith	NG New Ventures (OFTO)		
Nadir Hafeez	Ofgem		
Ross McGhin	NGET TO (Onshore)		

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Paul Mullen Guy Nicholson Damian Jackman Jeremy Caplin Rachel Woodbridge-Stocks	NGESO Code Admin Generator Generator SSE BSC Elexon NGESO (Presenter/Observer)	
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Issue	Paper No:	Summary
1 & 2 Welcomes		<ul style="list-style-type: none"> <li>•</li> </ul>
3 Minutes & Action log		<ul style="list-style-type: none"> <li>• Minutes agreed. AMC had some editorials.</li> <li>• 212 TM to update the Panel following her discussion with Gareth Davies and Rob Marshall about who is responsible for producing legal text for Code Modifications. CA will develop some guidance which will be circulated for comment.</li> <li>• 213 MB to circulate Governance Rule GR.22.4 around the Panel. Some further mods to be shared at the May GCRP.</li> <li>• 214 To raise a modification to resolve all housekeeping. June GCRP</li> <li>• 219 Update on the deferred action. Ongoing</li> <li>• 220 Update on the deferred action. Ongoing</li> <li>• 221 Code governance update from CUSC – same process as GCRP. Closed</li> <li>• 222 GH to develop the timeline and report back to the Panel with when the IT system changes will be Implemented re GC0126 WG meeting</li> <li>• 223 GH as independent chair to consider which parties are impacted by the modification re GC0103. GH has a new role in the TO, so MB proposes to be chair and see if there needs to be an independent technical chair (from SO). RW to be the ESO member.</li> <li>• 224 AC to ensure that network users are aware of the GC0103 modification. Raised at ITCG. Closed.</li> <li>• 225 MB to update the blockers table to include the number of extension requests each modification has had. Complete</li> <li>• 226 Code Administrator to remove the commentary next to GC0105. Complete</li> <li>• 227 / 228 July GCRP at Elexon, October GCRP at SSE, Glasgow.</li> <li>• 229 MB to circulate the email in relation to G5/5 to the Panel. Complete</li> <li>• 230 MB to circulate the CACoP Forum update email to the Panel. Complete.</li> </ul>

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<b>4 Chairman's Update</b>		<ul style="list-style-type: none"> <li>None</li> </ul>
<b>5 Authority Decisions</b>		<ul style="list-style-type: none"> <li>GC0114: System Operation Guideline: Prequalification Processes – decision expected within 3 weeks.</li> <li>GC0118: Modification to the Grid Code to accommodate the recent Distribution Code modification to Engineering Recommendation P28 – Voltage fluctuations and the connection of disturbing equipment to transmission systems and distribution networks in the UK – decision expected tomorrow</li> </ul>
<b>6 New Modifications</b>		<ul style="list-style-type: none"> <li>None</li> </ul>
GC0127: EU Code Restoration – Requirements resulting from System Defence Plan		<ul style="list-style-type: none"> <li>This modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the <b>System Defence Plan (SDP)</b>. Proposal is specifically to change the GCode to align to E&amp;R and SDP.</li> <li>There is a 12 month implementation period – but it's unclear whether this starts on 18 December 2018 or when SGUs are notified.</li> <li>Need to be clear when Users need to make any changes.</li> <li>Need to be clear which Users are affected – SGUs needed to be notified that they are an SGU by last December (ie December 2018).</li> <li>On the face of it, 18 December is the compliance date – Ofgem will receive the DFMR on 11 October, with a decision expected by 20 November so it doesn't give SGUs (or DNOs!) much time to make any changes.</li> <li>RWB to confirm whether this would apply to Embedded SGU / Storage units. Suggestion to liaise with MK and AMC. There may need to be a DCode modification if SGUs are embedded.</li> <li>There is a 'list of SGUs' by way of criteria. Appendix A in the SRP/SDP 'Criteria for the List of SGUs Responsible for Implementing Measures that Result from EU Code Mandatory Requirements or from National Legislation and Appendix B in the SRP/SDP 'List of SGUs Responsible for Implementing Measures that Result from EU Code Mandatory Requirements or from National Legislation' – Seems to include Type B, C, D generators who have a contract / provide a service to NGESO.</li> <li>RWB to add clarity on who are the SGUs to encourage them to participate in the WG and also help the DCRP to decide if there is a need for a Dcode Modification – ideally before the proposed May / June WG meeting.</li> <li>There may be commercial implications in the event that Storage devices are required to stop importing – as there will be an out of balance. CUSC implications to be considered.</li> <li>In addition to the 'LFDD' relays, there are requirements for SGUs to respond to requests from NGESO to increase their import. The arrangements for facilitating this are uncertain.</li> <li>Agreed standard governance and proceed to WG.</li> </ul>

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		<ul style="list-style-type: none"> <li>ToR <ul style="list-style-type: none"> <li>Confirm implementation trigger and implementation timeline</li> <li>Confirm who the SGUs are</li> <li>DCode implications – a joint WG be appropriate</li> <li>Consider whether all storage is affected – or just those who are SGUs</li> <li>Consider the technical requirements for the customers – what frequency do they need to respond as this needs to be triggered prior to any demand shedding from the LFDD scheme (they will be different to spread the demand disconnection), specification for the relays, testing, reporting etc</li> <li>GCode needs to focus on the obligations on Users</li> <li>Interaction with the existing commercial service, and existing LFDD arrangements. This proposal sits between the commercial service and existing LFDD.</li> <li>GS concerned that there is a need for detailed technical discussion between now and December – and that the WG shouldn't address things that NGESO need to do under their Licence Obligations.</li> <li>MB clarified that the WG should review the ToR at their first meeting and raise any concerns</li> </ul> </li> <li>'Challenging timeline agreed'</li> <li>Next step is a call for WG nominations</li> </ul>
GC0128: EU Code Emergency and Restoration – requirements resulting from System Restoration Plan		<ul style="list-style-type: none"> <li>This modification seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to requirements resulting from the System Restoration Plan (SRP).</li> <li>Some concern that the SO needs to be the frequency leader, rather than an Onshore TO or a Generator. Expectation seems to be that the Frequency Leader needs to be the SO, or TO.</li> <li>Need to remember that in EU, there could be multiple SO's involved in system restoration, and the general requirement is for the various SO's to pick one...</li> <li>The modification is to appoint a Frequency Leader – who is likely to be a (Scottish) TO – but the TO's aren't bound by the GCode, so should the change to be to the STC?</li> <li>Agreed standard govern ace and proceed to WG.</li> <li>Same or similar timeline / actions / ToR. ToR also to clarify who can be the Frequency Leader and in what circumstances?</li> <li>Next step is a call for nominations</li> </ul>
7 In Flight Modifications		<ul style="list-style-type: none"> <li></li> </ul>

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<b>7 'Blocker'</b>		<ul style="list-style-type: none"> <li>Brief overview given the agreed quarterly review period</li> </ul>
<b>7 GC0103 Harmonisation of standards</b>		<ul style="list-style-type: none"> <li>The proposers preferred solution was for the Scottish TOs to adopt the E&amp;W (NGET) RES and highlight any justifiable variations. But the proposer has had a change of mind and prefers the SP RES format as the starting point as they refer to the IEC standards</li> <li>This change of direction causes a problem for NGET(TO) as they need to review all the RES documents (20+) and decide if they could adopt the SP RES approach. However the DNOs and other Users are also affected by the NGET RES and this could have implications for DNOs. Potentially there could be a raft of RES documents being issued for approval in a 20 day period – although the RES documents may be substantially smaller than the present suite if they refer primarily to IECs.</li> <li>There may a need to be a GCode change as at the moment RES documents aren't formally covered by the GCode.</li> <li>There may be a need for ENA to review for consequences for ENATS for equipment installed in an NGET busbar zone</li> <li>Next meeting 17 May (via webex)</li> </ul>
<b>7 GC0105 Incident Reporting</b>		<ul style="list-style-type: none"> <li>Next meeting to be arranged</li> <li>One month extension agreed</li> </ul>
<b>7 GC0107/0113 DCC/ RfG Transparency</b>		<ul style="list-style-type: none"> <li>WG report due 27 June</li> <li>13 May next meeting</li> </ul>
<b>7 GC0109 The open, transparent, non-discriminatory and timely publication of the various GB Electricity Warnings or Notices</b>		<ul style="list-style-type: none"> <li>WG report due August</li> </ul>
<b>7 GC0117 Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements</b>		<ul style="list-style-type: none"> <li>Initial impact assessment complete and presented to Feb GCRP</li> <li>WG report due 30 July – prob challenging</li> <li>There has been some work with ENA Open Networks</li> </ul>

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<b>7 GC0123: Clarifying references to NGET and Relevant Transmission Licensees</b>		<ul style="list-style-type: none"> <li>The need for this was identified at the 14/3/19 special meeting.</li> <li>Links to GC0120, GC0122.</li> <li>Following the approval of GC0122 by the Panel as fast-track self-governance in March 2019, this modification is being raised to clarify to users that certain functions performed by NGET are also performed by the Relevant Transmission Licensees and also to make other minor corrections indicated by the Panel</li> <li>Nominations close tomorrow – only 4 nominations so far</li> <li>WG meeting on 9 May</li> </ul>
<b>7 GC0124: Critical Friend review period for submission of new modifications</b>		<ul style="list-style-type: none"> <li>This modification seeks to codify a requirement for new modifications to be submitted to the National Grid ESO Code Administrator for a period of five working days ahead of when the modification is to be submitted to the Grid Code Panel. This period will allow the Code Administrator to deliver a better service and in turn allow all network users to better understand code modifications.</li> <li>CA Consultation closes 14 May</li> </ul>
<b>7 GC0125: EU Code Emergency &amp; Restoration: Black Start testing requirements for Interconnectors</b>		<ul style="list-style-type: none"> <li>This modification seeks to align the Grid Code with the European Emergency and Restoration Code, specifically in relation to Black Start testing for Interconnectors</li> <li>Nominations close tomorrow – 5 so far</li> <li>WG meeting on 9 May</li> </ul>
<b>7 GC0126: Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068</b>		<ul style="list-style-type: none"> <li>This modification aims to progress the Profiled Stable Import and Export Limits identified in the Cost Benefit Analysis carried out on BSC P297 and GC0068, over 5 years ago.</li> <li>Some parts of GC0068 were implemented, but others were not, pending full implementation of EBS. The EBS didn't deliver the means for generators to submit SEL/SIL – Stable Export / Import Limit – information. Full implementation of EBS currently on hold.</li> <li>Need to make sure that the new IT system is capable of receiving the SEL/SIL information – alignment of the timing between the GCode obligation and the means of submitting it.</li> <li>Not a DNO issue</li> <li>Nominations close tomorrow – insufficient nominations so far</li> </ul>
<b>8 Prioritisation Stack</b>		<ul style="list-style-type: none"> <li>Existing prioritisation generally OK, new ones to be slotted in</li> <li>GC0127 – similar to GC0125 as its EU implementation, but would require GCode and Dcode Users to take action (new equipment)</li> <li>GC0128 – similar to GC0125 as its EU implementation</li> </ul>

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		<ul style="list-style-type: none"> <li>Agreed order GC0127,GC0125, GC0128, balance of the stack</li> </ul>
<b>9 GC0121 (No deal Brexit arrangements) &amp; Brexit</b>		<ul style="list-style-type: none"> <li>Proposal is to retain on hold and arrange a special meeting as and when required.</li> <li>Government plan is that we should plan for 31 October as the 'no deal' exit date.</li> <li>Draft Final Modification Report is ready, but not published, so its OK to remain on hold.</li> <li>CA need to review to make sure no consequential changes arise from modifications made until then – and keep the changes ready to apply on 31 October</li> <li>GS to confirm this position in writing.</li> </ul>
<b>10 GC0096 Storage</b>		<ul style="list-style-type: none"> <li>Action is to decide if the WG has met its ToR</li> <li>Raised in May 2016</li> <li>Agreed that ToR have been met</li> <li>Total Shutdown definition has been revised so that if there were no storage operating, this would be a Total Shutdown and lead to market suspension. General agreement is that the definition was incorrect.</li> <li>It was agreed to make the suggested changes and formally notify the WG of these and seeking any objections. If no objections were received this would proceed to Code Administrators consultation.</li> </ul>
<b>12 Draft Final Modification Reports</b>		<ul style="list-style-type: none"> <li>None</li> </ul>
<b>13 Report to the Authority</b>		<ul style="list-style-type: none"> <li>None</li> </ul>
<b>14 Implementation Updates</b>		<ul style="list-style-type: none"> <li>The following Legal Separation Modifications have been implemented <ul style="list-style-type: none"> <li>GC0112</li> <li>GC0120</li> <li>GC0122</li> </ul> </li> </ul>
<b>15 Electrical Standards</b>		<ul style="list-style-type: none"> <li>Communication Standards – this could be applied retrospectively.</li> <li>AMC provided comments, which are being progressed; it will be circulated for 20 days once they have been incorporated. AMC to share my comments to GCRP - Complete</li> </ul>
<b>16 Governance</b>		<ul style="list-style-type: none"> <li>Modification extensions. The suggestion is that extensions are agreed by default, but the present arrangements are prob more transparent.</li> <li>This is separate to monitoring the reasons for requesting an extension.</li> </ul>
<b>17 GCDF</b>		<ul style="list-style-type: none"> <li>GCDF 8 May</li> <li>GC0123 8 May</li> </ul>

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		<ul style="list-style-type: none"> <li>GC0125 9 May</li> <li>GC0126 9 May</li> </ul>
<b>18 Standing Updates</b>		<ul style="list-style-type: none"> <li>DCRP Headline report to be provided following the DCRP meeting on 11 April. MB to chase VH</li> <li>Re G5, ENA have committed to raise the GCode Mod as per P28. Dcode consultation information has been circulated to GCRP.</li> <li>JESG Next meeting 14 May (BEIS will be in attendance)</li> </ul>
<b>19 Horizon Planning</b>		<ul style="list-style-type: none"> <li>NG to add the E&amp;R implications</li> </ul>
<b>20 Plan on a page</b>	Joseph Henry	<ul style="list-style-type: none"> <li>Two options –Interactive Plan on a Page, Traditional plan on a page</li> <li>Traditional (linear) Plan on a page is probably slightly cheaper</li> </ul>
<b>21 AOB</b>		<ul style="list-style-type: none"> <li>Ofgem/BEIS code review. Industry workshop – Ofgem will consult later in the summer and not in My as originally planned.</li> <li>Ofgem Supplier Licencing Review – has resulted in changes to supplier licences. Application process will be more robust</li> </ul>
<b>21 RIIO T2</b>		<ul style="list-style-type: none"> <li>First iteration of the TOs plan will be published soon</li> <li>Fully digital version of the Grid Code has been suggested - thought is that this could be an interactive version and enable a category of user to identify the relevant sections for their particular connection, Also a suggestion that it could be principles based.</li> </ul>
<b>22 Meeting dates</b>		<ul style="list-style-type: none"> <li>30 May 2019</li> <li>27 June 2019</li> <li>30 July 2019 London</li> <li>29 August 2019</li> <li>26 September 2019</li> <li>24 October 2019 Glasgow</li> <li>28 November 2019</li> <li>19 December 2019</li> </ul>