

DCRP_19_07_02		Subject:	Grid Code Review Panel
		Author:	Alan Creighton
		Date:	26 September 2019

All

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

- Further update on the 9 August incident provided.
- GC0107/113 consultation the transparency of RfG 'values' is progressing to include DCC issues as well.
- GC0127/8: These modifications seek 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) and System Restoration Plan (SRP). Following feedback from Ofgem, legal text for the three WAGCMs is to be developed before the Code Administrators Consultation.
- GC0129: Changes to implement EREC G5 (Harmonics) is currently out for Code Administrators Consultation with a closing date of 11 October.
- GC0131: NGESO are proposing changes to address issue that have been affecting progress of Modifications eg lack of quoracy, production of legal text.
- GC0132: NGESO are proposing changes to the GCode Governance to accommodate changes associated with the European Balancing Guidelines

Other interesting snippets highlighted in yellow

Regards Alan

Attendees:		Apologies:	
Alastair Frew	Generator Drax	Steve Cox	DNO
Rob Wilson	NGESO (Alternate)	Tony Johnson	NGESO (Alternate)
Paul Mullen	NGESO Code Admin	Sigrid Bolik	Generator (Observer)
Ross McGhin	NGET TO (Onshore)	Colm Murphy	NGESO
Damian Jackman	Generator SSE	Richard Woodward	NGET TO (Onshore) Alternate
Nadir Hafeez	Ofgem		
Jeremy Caplin	BSC Elexon		
Rob Longden	Supplier		
Joe Underwood	Generator EUK		
Chris Smith	NG New Ventures (OFTO)		

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Trisha McAuley	Code Admin Chair	
Gurpal Singh	Ofgem	
Alan Creighton	DNO	
Phil Smith	NGESO (Observer)	
Guy Nicholson	Generator	
Graeme Vincent	DNO (Alternate)	
Kirstin Shilling	NGESO	
Emma Hart	NGESO Code Admin	

Issue	Paper No:	Summary
<b>9 August incident update</b>		<ul style="list-style-type: none"> <li>• Graeme Stein</li> <li>• 6 September NGESO technical report - P15, P19, P20 have the key diagrams</li> <li>• Other parties considering and will publish their reports eg E3C and Ofgem</li> <li>• Many similarities to the 2008 event, one difference is the complexity of the voltage control arrangements</li> <li>• RoCoF was probably between 0.16 - 0.18Hz/s ie &gt;0.125Hz/s. Less DG tripped than NGESOs model predicted</li> <li>• Inverter functionality can be influenced by software upgrades – how might compliance be assured on an enduring basis. Might there be a risk of future common mode failure eg faulty software uploaded to significant numbers of wind turbines.</li> <li>• Poss need to review responsibilities for ensuring compliance.</li> </ul>
<b>1 &amp; 2 Welcomes</b>		<ul style="list-style-type: none"> <li>• Rob Wilson will be the permanent ESO Rep with Tony Johnson as an alternate</li> </ul>

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<b>3 Minutes &amp; Action log</b>		<ul style="list-style-type: none"> <li>• 29 August and 10 September minutes approved</li> <li>• 213 Insert Workgroup and Workgroup Chair responsibilities into the Ways of Working presentation. To be circuited soon and discussed at the Oct GCRP.</li> <li>• 214 To raise a modification to resolve all housekeeping. Now planned for October GCRP, due the E&amp;R Modifications workload.</li> <li>• 246 Code Administrator to look into quoracy as a whole and present back to Panel a cross code view on what can be done to resolve this barrier. Now in GC0131</li> <li>• 248 Code Administrator to contact Ofgem to discuss GC0126 lack of quoracy. Discussions between NGESO and Ofgem re proceeding directly to CA consultation if there is insufficient interest from Industry. Likely to be acceptable. As the solution is well developed GCRP agreed to proceed to CA consultation rather than go through a WG consultation as a means of reviewing the (NGESO) legal text. Ongoing. JC and AJ liaising.</li> <li>• 255 Code Administrator to review feedback provided by Panel on the Proposal Forms and ascertain what improvements can be made to form or guidance around this. PM would like to improve the guidance on the Proposal Form itself to help completion. Critical Friend changes implemented. Ongoing</li> <li>• 258 PM to provide a written update on each deferred action and present back at June Panel. Ongoing – CA to confirm that will be picked up in the Customer Journey work. Ongoing</li> <li>• 266 Code Administrator to take on board further Panel comments on non-quorate workgroups and provide update at September Panel. See earlier GC0131</li> <li>• 269 Code Administrator to review the technology supporting phone and video conferencing participation in workgroups and provide an update to the Panel. Some work has been carried out to improve things – other improvements are planned. Feedback required. Ongoing</li> <li>• 273 RW to consider what can be done in terms of creating greater transparency around the technical details included in Bilateral Connection Agreements and provide an update to the Panel.</li> </ul>

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		<p>Circulated on 8 August. RW to liaise with Chris Smith &amp; Ross McGhin [and other onshore TOs] to clarify the issue &amp; report back.</p> <ul style="list-style-type: none"> <li>• 274 RW to consider the next steps in relation to updating the Data Registration Code and provide an update to the Panel. September GCRP. See 273</li> <li>• 276 Code Administrator to circulate the email sent by Tim Ellingham to the Panel for discussion at the August 2019 Panel. Related to D11 Operational Intertripping Scheme. Complete – definition will be reinstated as a housekeeping change.</li> <li>• 278 Code Administrator to investigate to confirm if the 5 actions raised against the GCRP regarding the 27 May 2008 incident were delivered.</li> <li>• 279 Code Administrator to clarify ESO position on running the Code Administrator Consultation for GC0125, GC0127 and GC0128 during the reporting period. These will continue.</li> <li>• 280 GN to forward to all Panel members. Title has been revised</li> <li>• 281 Code Administrator to send out email request for Gc0130 Workgroup nominations and set up the meeting.</li> <li>• 282 Code Administrator to contact Ben Pirie of Ofgem who is working on GC0103 to join the Workgroup to provide some clarity. Ongoing Ofgem will be an observer.</li> <li>• 283 GC0126: AJ to review the Legal Text and provide comments to JC week commencing 02 September 2019. Closed</li> <li>• 284 PM to ensure that the GC0127/GC0128 CA Consultation includes further information about each of the WAGCM solutions. On agenda</li> <li>• 285 PM to draft and send a letter, on behalf of the Chair, to Ofgem requesting a decision in relation to whether GC0127/GC0128 may proceed to CA Consultation without the legal text for WAGCM 1, WAGCM 2 and WAGCM 3 being developed. On agenda.</li> </ul>
<b>4 Chairman's Update</b>		<ul style="list-style-type: none"> <li>• None</li> </ul>

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Issue	Paper No:	Summary
<b>5 Authority Decisions</b>		<ul style="list-style-type: none"> <li>• None</li> </ul>
<b>6 New Modifications GC0131: Quick wins to improve the governance</b>		<ul style="list-style-type: none"> <li>• Proposal is to try to address some of the issues that have affected the operation of the GCRP: <ul style="list-style-type: none"> <li>○ Initial assessment of proposals</li> <li>○ Quoracy</li> <li>○ Assessment of alternatives – ‘better than proposal’ rather than better than baseline’. This is the procedure in BSC, but this could be contentious. RW indicated that if this component became a sticking point, then he’d withdraw it from the proposal.</li> <li>○ Titles and summaries of proposals</li> <li>○ Role of the Code Administrator Consultation</li> <li>○ Production of draft legal text</li> </ul> </li> <li>• There have been some changes to the original proposal to try to try to make sure that they are all considered to be quick wins and can be implemented quickly.</li> <li>• <b>Agreed to proceed via normal governance via workgroup, and Ofgem governance.</b></li> <li>• Terms of Reference <ul style="list-style-type: none"> <li>○ Report finding to CUSC for info</li> <li>○ Consider whether removing one of the components would facilitate progression of the remainder as ‘quick wins’</li> <li>○ WG will refine these at the first meeting and feedback to the GCRP</li> </ul> </li> </ul>
<b>6 New Modifications GC0132: Updating the Grid Code governance process to ensure we capture European Balancing Guideline change process for</b>		<ul style="list-style-type: none"> <li>• European Balancing Guideline Article 18 requires the TSO to develop a proposal for the Terms and Conditions for Balance Service Providers (BSPs) and Balance Responsible Parties (BRPs).</li> <li>• National Grid ESO identified that these terms and conditions already exist in our current GB frameworks and codes</li> <li>• EBGL has its own change process in Art 6 and Art 10 that will affect some of the GCode / CUSC / BSC change process – so these will need to be revised. Areas include:</li> </ul>

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<b>Article 18 Terms and Conditions (T and Cs)</b>		<ul style="list-style-type: none"> <li>○ One month consultation in place for proposed changes that affect Art 18 Terms and Conditions</li> <li>○ An EBGL Art 18 change proposal form is recognised and raised during the standard modification process</li> <li>○ National Grid ESO responds to all industry consultation feedback on any Art 18 proposed changes</li> <li>○ Anyone party to the Grid Code can raise a draft EBGL Art 18 change proposal</li> <li>○ Ensure all modifications that affect Art 18 T and Cs go to the Authority for a decision</li> <li>○ Send back process is captured</li> <li>• Ofgem want one co-ordinated submission for all codes.</li> <li>• Agreed to proceed to a workgroup (one WG meeting expected) then a WG consultation, standard governance authority decision</li> <li>• AW suggested that some stakeholders may propose that the 1 month consultation should apply to all GCode proposals – that would be a simpler implementation of the requirements</li> <li>• Seems like there is still time to do this and meet the compliance deadline of 4 April 2020.</li> <li>• ToR <ul style="list-style-type: none"> <li>○ Consider if the proposal should apply to all GCode Modifications</li> <li>○ Consider if a WG consultation is required</li> </ul> </li> </ul>
<b>7 In Flight Modifications</b>		
<b>7 GC0096 Energy Storage</b>		<ul style="list-style-type: none"> <li>• Some comments had been received in the CA consultation process, which looked like they were not just editorial and needed to be addressed <ul style="list-style-type: none"> <li>○ Concern about the definition of Registered Capacity and whether this is different for Import / Export.</li> <li>○ Concern that there might be a BSC modification that needs to be in place.</li> </ul> </li> <li>• Presented at the October GCRP</li> </ul>

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<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 be a need for ENA to review for consequences for ENATS for equipment installed in an NGET busbar zone</li> <li>Ofgem agreed with the proposer that this work should continue as the BEIS / Ofgem Standards review was at a much higher level</li> <li>Concern that the value case hasn't been demonstrated</li> <li>No recent progress – none expected before December at the earliest</li> </ul>
<b>7 GC0105 Incident Reporting</b>		<ul style="list-style-type: none"> <li>2 October WG Vote</li> <li>To be presented to the October GCRP</li> </ul>
<b>7 GC0107/0113 DCC/ RfG Transparency</b>		<ul style="list-style-type: none"> <li>GC0113 solution is being developed. GC0107 has been developed and consulted upon</li> <li>9 October meeting</li> <li>WG are to seek a delay probably for a couple of months so that GC0107 and GC0113 can be presented to panel</li> </ul>
<b>7 GC0109 The open, transparent, non-discriminatory and timely publication of the various</b>		<ul style="list-style-type: none"> <li>Comments on WG report being considered</li> <li>16 October WG meeting.</li> </ul>

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<b>GB Electricity Warnings or Notices</b>		
<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>• There has been some work with ENA Open Networks – discussion with ON team today</li> <li>• Likely to be deferred due to CA resource</li> <li>• <b>Next meeting to be arranged</b></li> </ul>
<b>7 GC0121 GC Changes in the event that UK leaves the EU without an agreement</b>		<ul style="list-style-type: none"> <li>• <b>Current proposal prepared for the previous Brexit day to be reviewed ready for the 1 November special meeting.</b></li> <li>• <b>RfG, DCC, HVDV and legal separation aspects need to be reviewed</b></li> </ul>
<b>7 GC0125 EU Code Emergency &amp; Restoration: Black Start testing requirements for Interconnectors</b>		<ul style="list-style-type: none"> <li>• GC0125 seeks to align the GB Grid Code with the European Emergency and Restoration Code, specifically in relation to Black Start testing for Interconnectors.</li> <li>• Ofgem would like this to be sent to them alongside the GC0127/8.</li> <li>• <b>DFMR to be presented at the October GCRP.</b></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>• Method proposed to progress despite not being quorate – provided that the legal text was reviewed. JC comments to be reviewed by NGESO. There could be some BSC timing implications.</li> </ul>



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		<ul style="list-style-type: none"> <li>• Not a DNO issue</li> <li>• Will proceed directly to CAC</li> </ul>
<b>7 GC0127: EU Code Restoration – Requirements resulting from System Defence Plan</b>		<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 Defence Plan (SDP). Proposal is specifically to change the GCode to align to E&amp;R and SDP.</li> <li>• The Modification report needs to be with Ofgem for October so that they can make a decision in time for the December deadline.</li> <li>• This WG is combined with GC0127/128 and there will be a common Modification Report. GCRP agreed that the WG should be combined.</li> <li>• SDP and SRP are linked to these modifications – although these have a different governance route.</li> <li>• 10 September WG meeting agreed not to develop the legal text for the alternatives, but Ofgem disagreed.</li> <li>• The legal text is to be finalised this week – and sent to the WG but will be quite contentious.</li> <li>• Arguably only the Proposer of the Alternatives need to be happy with the WAGCMs legal text</li> <li>• Depending on the feedback from the CA Consultation, there could be further WG discussion required.</li> <li>• CA Consultation expected 16 October for 1 month. Very tight timeline – there is a compliance risk. The timeline has been discussed with Ofgem; they're concern about the lack of time to make a decision.</li> </ul>
<b>7 GC0128: EU Code Emergency and Restoration – requirements resulting from System Restoration Plan</b>		<ul style="list-style-type: none"> <li>• See GC0127</li> </ul>

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7 GC0129 EREC G5		<ul style="list-style-type: none"> <li>CA Consultation closes 11 October</li> </ul>
7 GC0130 Change for simplifying 'output useable' data submission and utilising REMIT data		<ul style="list-style-type: none"> <li>The current system used by Generators for submitting outage and output useable data is TOGA. This system is currently reaching the end of its life and is soon to be decommissioned.</li> <li>Feedback from industry work groups highlighted that some Generators no longer want to submit data to TOGA as they are already required to submit higher resolution data under the REMIT obligations.</li> <li>Larger Generators already use REMIT though they also need to submit data under TOGA as well to ensure they comply with the current requirements of OC2. Some Smaller Generators submit OC2 data via TOGA alone and are not yet using the REMIT system.</li> <li>The current OC2 code requires some streamlining to ensure the submitted REMIT data would be compliant with its requirements.</li> <li>For those Generators who still supply data via TOGA, then any change to OC2 would still mean that they are submitting data which is compliant with of OC2 - the advantage is that any Generator who submits data via REMIT and TOGA would, once the proposed changes have been made to OC2, only need to supply data via REMIT.</li> <li>National Grid ESO will help guide new users and those currently only using TOGA, to REMIT as we would during any system change or upgrade.</li> <li>The legal text sets out the information to be exchanged rather than the vehicle for exchanging the information.</li> <li>RW concerned that some small generators may be forced to use REMIT which is a more onerous requirement than TOGA and is a EU compliance requirement rather than a GCode compliance requirement – although this isn't GCode issue but one associated with decommissioning of TOGA.</li> <li>The general agreement is that the proposal is OK, but the follow on and separate change to decommission TOGA could be more controversial. The difference between the GCode change and</li> </ul>

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		<p>the TOGA project in relation to smaller generators needs to be clearer.</p> <ul style="list-style-type: none"> <li>Not an issue for DNOs</li> <li>WG on 1 October</li> </ul>
8 Prioritisation Stack		<ul style="list-style-type: none"> <li>Agreed to prioritise GC0130 above GC0109</li> <li>Agreed to prioritise GC0131 &amp; 0132 above GC0109</li> <li>CA will support c10 WG meetings per month across GCode and CUSC</li> <li>2020- 2 WG days per month</li> </ul>
9 Break		<ul style="list-style-type: none"> <li></li> </ul>
10 Report to the Authority		<ul style="list-style-type: none"> <li>None</li> </ul>
11 Implementation Updates GC0123 NGET / Relevant Transmission Licensee clarification		<ul style="list-style-type: none"> <li>Looked to sort out some of the residual issues associated with legal separation</li> <li>Implemented on 4 September</li> </ul>
12 Electrical Standards		<ul style="list-style-type: none"> <li>None</li> </ul>
13 Governance		<ul style="list-style-type: none"> <li>See item 8</li> </ul>
14 GCDF		<ul style="list-style-type: none"> <li>October 2019 GCDF. One poss agenda item – may be cancelled</li> <li>GC0107/0113 on WG day</li> </ul>
15 Standing Updates		<ul style="list-style-type: none"> <li>DCRP Headline Report – no meeting since the last GCRP</li> <li>JESG – BEIS Brexit update.</li> </ul>

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<b>16 Horizon Scanning</b>		<ul style="list-style-type: none"> <li>OK. Need to make sure future mods are started early enough to avoid running out of time</li> </ul>
<b>17 CACoP update</b>		<ul style="list-style-type: none"> <li>Single CACoP website being proposed</li> </ul>
<b>18 Forward Plan</b>		<ul style="list-style-type: none"> <li>OK</li> </ul>
<b>19 AOB Code Summary Document</b>		<ul style="list-style-type: none"> <li>To be updated</li> </ul>
<b>19 AOB Modification Tracker</b>		<ul style="list-style-type: none"> <li>To be added as a standing item</li> </ul>
<b>19 AOB 220kV</b>		<ul style="list-style-type: none"> <li>There are some 220kV assets on the transmission system – a voltage that isn't covered in the GCode so far.</li> <li>There has been a similar modification – CA to investigate</li> </ul>
<b>19 AOB Cross Code satisfaction survey</b>		<ul style="list-style-type: none"> <li>Results to be published soon</li> </ul>
<b>20 Meeting dates</b>		<ul style="list-style-type: none"> <li>24 October 2019 Glasgow SSE office</li> <li>28 November 2019</li> <li>19 December 2019</li> </ul>