

DCRP_19_05_02b		Subject:	Grid Code Review Panel
		Author:	Alan Creighton
		Date:	30 July 2019

All

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

- Several discussions relating to concerns about the code governance process, stakeholder participation, quality of the Reports to the Authority etc. and the general need to improve the change process. Resolution of these is likely to be subsumed into the BEIS / Ofgem code review, but there are some possible quick wins proposed by NGESO.
- GC0096: Storage. To be discussed at the August GCRP
- 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). 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. The most significant issue for DNOs is likely to be the requirement to test LFDD relays every 3 years. Closing date for the consultation 16 August
- A revised Critical Friend process will be implemented by the CA on 1 August.

Other interesting snippets highlighted in yellow

Regards Alan

Attendees:		Apologies:	
Alastair Frew	Generator Drax	Colm Murphy	NGESO
Emma Hart	NGESO Code Admin	Trisha McAuley	Code Admin Chair
Rob Wilson	NGESO (Alternate)	Steve Cox	DNO
Paul Mullen	NGESO Code Admin		
Damian Jackman	Generator SSE		
Nadir Hafeez	Ofgem		
Jeremy Caplin	BSC Elexon		
Rob Longden	Supplier		
Chris Smith	NG New Ventures (OFTO)		
Ross McGhin	NGET TO (Onshore)		
Guy Nicholson	Generator		
Graeme Vincent	DNO (Alternate)		
Gareth Davies	NGESO acting chair		
Joe Underwood	Generator EUK		
Gurpal Singh	Ofgem		

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Chris Webb	BOC - observer	
Alan Creighton	DNO	
Phil Smith	NGESO (Observer)	

Issue	Paper No:	Summary
1 & 2 Welcomes		•
3 Minutes & Action log		<ul style="list-style-type: none"> • Concern that the minutes had been streamlined too much and points that had been agreed did need to be recorded. PM to review the notes from the last meeting and update. • 213 MB to circulate Governance Rule GR.22.4 around the Panel. Relates to the development of Legal Text. Rachel Hinsley is progressing and will be circulated off line. MK and AMC comments. Ongoing by the end of August • 214 To raise a modification to resolve all housekeeping. Now planned for October GCRP, due the E&R Modifications. • 222 Greg Heavens to develop the timeline and report back to the Panel with when the IT system changes will be implemented re GC0126 WG meeting – EBS implementation is due in November 2020 – although this may be delayed further. Agreed to close in the basis that the action will be picked up in due course. • 236 RWS agreed to clarify whether Article 48 (GC027/128) is being dealt with elsewhere after reviewing the code mapping. Further clarity is required, ongoing as part of GC0127/128. Art 48 is included in GC0127/8. • 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. On agenda. • 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 develop GCRP agreed to proceed to CA consultation rather than go through a WG consultation as a means of reviewing the (NGESO) legal text. JC had volunteered to have a look – other GCRP members are requested to read through the document as well. Will review again for August GCRP. • 252 Code Administrator to provide guidance clarifying our commitment to meet the recommendations SSE proposed and clarify the checks Code Administrator will undertake. CA has drafted a note and will email when it's complete. Relates to Critical Friend Guidance. On agenda • 254 Code Administrator to ensure Workgroup members are aware of agreed Panel position re: quorate meetings becoming non-quorate within three weeks of its planned date. ESO view is that WG meetings will still be cancelled

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		<p>24 hours before the meeting, and they will encourage WG members to turn up, use alternates, have more WG members on the WGs etc. SC & AF at the June GCRP both concerned that this may not be efficient. The challenge is the need for a fair representation from Industry. Agreement that GCRP members aren't happy with WG meetings being cancelled at short notice and that they should be planned well in advance. CA to reconsider but NGESO still want to stick to this. RW has some suggestions re governance – on agenda. Quoracy is an issue across all codes. Chris Webb suggested ore use of technology and reduce the number of 'steps / hurdles' that code modifications need to progress through. NGESO to take an action re remote comms technology works better.</p> <ul style="list-style-type: none"> • 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. Ongoing • 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 • 259 CS to provide an email to Code Administrator requesting National Grid ESO to explore more on the misalignment. National Grid ESO to respond at July Panel. Relates to OFTOs. Ongoing • 260 Code Administrator to consider having regular short discussions with Ofgem and how to ensure that the reports are of acceptable quality. NGESO & Ofgem to liaise more frequently • 261 Ofgem (GS) to consider Ofgem attendance at high priority workgroups. Ofgem confirmed that they aim to attend as an observer all WG meeting rather than just high priority / material ones – however these are industry lead modifications and Ofgem have resource limitations. Examples where guidance from Ofgem might be helpful include where there is an interpretation of EU law e.g. GC0127/8. AMC point that Ofgem view of the application of EU law is prob better than each party establishing its own legal view of EU law. • 262 Code Administrator to set up a date for a special panel meeting in September 2019 for GC0127/128. Complete. • 263 Panel have raised concerns about the resources allocated to modifications; Code Administrator to provide assurance on what is being done to mitigate this risk. GD reported that NGESO are looking to recruit. • 264 Code Administrator to look at Richard Woodward prioritisation document to see how it can be introduced into the current process and increase quality of Proposal Forms and transparency. Ongoing • 265 Code Administrator to check the individual sections of the Grid Code on the website are the most up to date version. Complete • 266 Code Administrator to take on board further Panel comments on non-quorate workgroups and provide update

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		<ul style="list-style-type: none"> at July Panel. See earlier 267 Code Administrator to consider proposed updates to “Legal Text Production for Modifications” and update as required. Ongoing. See earlier. To be circulated round the GCRP first.
4 Chairman’s Update		<ul style="list-style-type: none"> GD head of code administrator team Forward Plan (spring) <ul style="list-style-type: none"> View of key deliverables in 2019/20. Fed from customer journey work. Quality to be improved - resources and capability being improved. Then looking to facilitate industry participation RIO2 ambitions (July) <ul style="list-style-type: none"> Energy code review mitigation – move towards a code manager. Whole system code Transmission and Distribution – and develop a digitalised version so that a ‘bespoke code for a User can be available Intermediate milestones. Some metrics are available so that the performance of NGESO CA can be compared. CACoP survey, survey of WG members post Workgroups and comparison against milestones. Aspects of code governance <ul style="list-style-type: none"> Quality, quoracy, legal text. GD seeking views from the GCRP members.
5 Authority Decisions		<ul style="list-style-type: none"> Nothing decisions outstanding From a Dcode perspective a decision on DC0070 Retrospective RoCoF changes is due soon.
6 New Modifications		<ul style="list-style-type: none"> None
7 In Flight Modifications		<ul style="list-style-type: none">
7 GC0096 Energy Storage		<ul style="list-style-type: none"> See below
7 GC0103 Harmonisation of standards		<ul style="list-style-type: none"> The proposers preferred solution was for the Scottish TOs to adopt the E&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 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. There may be a need for ENA to review for consequences for ENATS for equipment installed in an NGET busbar zone

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		<ul style="list-style-type: none"> Ofgem agreed with the proposer that this work should continue as the BEIS / Ofgem Standards review was at a much higher level Concern that the value case hasn't been demonstrated Timeline still to be agreed.
7 GC0105 Incident Reporting		<ul style="list-style-type: none"> No progress recently – likely to be delayed further. Next meeting to be arranged in September
7 GC0107/0113 DCC/ RfG Transparency		<ul style="list-style-type: none"> GC0107 is to proceed to WG consultation on 31 July and be returned to the October GCRP The GC0113 aspects will be treated separately based on the same principles.
7 GC0109 The open, transparent, non-discriminatory and timely publication of the various GB Electricity Warnings or Notices		<ul style="list-style-type: none"> Likely to be delayed further due to the volume of comments received. No timeline agreed as yet. Ongoing
7 GC0117 Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements		<ul style="list-style-type: none"> There has been some work with ENA Open Networks – discussion with ON team today Likely to be deferred due to CA resource Next meeting to be arranged
7 GC0123: Clarifying references to NGET and Relevant Transmission Licensees		<ul style="list-style-type: none"> Links to GC0120, GC0122. 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 WG report on agenda
7 GC0125: EU Code Emergency & Restoration: Black Start testing requirements for		<ul style="list-style-type: none"> This modification seeks to align the Grid Code with the European Emergency and Restoration Code, specifically in relation to Black Start testing for Interconnectors WG Vote on 7 August To be considered at the August GCRP

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Interconnectors		
7 GC0126: Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068		<ul style="list-style-type: none"> 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. 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. Not a DNO issue Method proposed to progress despite not being quorate – see earlier
GC0127: EU Code Restoration – Requirements resulting from System Defence Plan		<ul style="list-style-type: none"> 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&R and SDP. NGESO have published further clarity re who is an SGU Ofgem have provided feedback on the System Defence Plan and System Restoration Plan, which has been addressed by NGESO. Currently these are out for public consultation and updated plans will be submitted to Ofgem. The Modification report needs to be with Ofgem for October so that they can make a decision in time for the December deadline. The WG report needs to come to a special GCRP September. This WG is combined with GC 127/128 and there will be a common Modification Report. GCRP agreed that the WG should be combined. The WG report is currently out for consultation. DNOs need to review the proposed LFDD testing requirements Special panel meeting required in October for the DFMR (post CA consultation) SDP and SRP are linked to these modifications – although these have a different governance route.
GC0128: EU Code Emergency and Restoration – requirements resulting from System Restoration Plan		<ul style="list-style-type: none"> See GC0127
GC0129 EREC G5		<ul style="list-style-type: none"> Agreed to wait until the DCRP has finalised G5 following the feedback received from the DCRP consultation. Need to update the references – expected to be just a CA consultation Date still to be established.

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7 Dashboard		<ul style="list-style-type: none"> High level count of the number of WGs – summary of the plan on the page
8 Prioritisation Stack		<ul style="list-style-type: none"> GC0096 needs be completed – just needs to get finished to address the minor changes. Agreed to position just below GC0127 & GC0128 GC0103 been demoted to just above GC0105 – although in practice its unlikely to have any impact.
9 Draft Final Modification Report GC0123 NGET / Relevant Transmission Licensee clarification		<ul style="list-style-type: none"> Looked to sort out some of the residual issues associated with legal separation DFMR circulated with the papers. A few AMC comments – just editorials / duplicate words etc. which were agreed OFTOs have been approached and included in the standard distribution list – assent by silence. No new requirements on the OFTOs. Appeal window would be opened on 7 August for a month.
10 Draft Final Modification Report GC0096 Storage		<ul style="list-style-type: none"> 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"> Concern about the definition of Registered Capacity and whether this is different for Import / Export. Concern that there might be a BSC modification that needs to be in place. A revised GC0096 DFMR is to be presented at the Aug GCRP
11 Report to the Authority		<ul style="list-style-type: none"> None
12 Implementation Updates		<ul style="list-style-type: none"> GC0111 Implemented GC0114 1 August implementation date
13 Electrical Standards		<ul style="list-style-type: none"> None
14 Governance Critical Friend		<ul style="list-style-type: none"> For information only Relates to GC0124 to facilitate the modification process Implementation on 1 August for new Mod Proposals Relate to the timeline for parties to submit Mod Proposals which will now be 5 days earlier List of critical friend checks – although the Proposer isn't obliged to take the advice There is a minimum set of requirements that the Modification Proposal needs to meet although these aren't particularly onerous The context seems to be to ensure that the quality of Mod Proposals increases. The CA to provide feedback to the GCRP if the Mod Proposal meets the min requirement and whether the Proposer has taken on board the guidance from the CA. If there are some deficiencies, the GCRP could add to the TOR to specifically address the deficiency.

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14 Governance Quick Wins		<ul style="list-style-type: none"> • Intended to be quick wins only to address difficulties associated with progressing GCode mods eg resources and quoracy. If they can't be progressed quickly then they are probably not worth doing. Linkage to the BEIS energy code review • NGESO – mandatory participation – proposal is to remove the requirement. Seems OK for NGESO not to attend where they have no specific input. In most case though NGESO would prob want to attend though. NGESO are 'appointed' to the panel – so that might need to change. Also could exacerbate quoracy issues. Probably wouldn't impact many – RW inclined to not proceed with this. • Initial Assessment of Proposals. This was looking to do an initial impact assessment first then report back to the panel eg GC0117. The intention is to clarify the proposal. Links to the steps taken to improve the quality of Modifications • Quoracy. These arise where there is a niche interest group or where stakeholders are simply not interested in progressing a Mod for whatever reason. Proposal is to progress a WG in the event that the work isn't quorate – providing that certain safeguards are in place to try to mitigate the risks eg always have a WG consultation. Even a quorate WG could be populated by folk with a biased view. Ofgem should have a veto for a non-quorate WG. Perhaps there is an increase role for the Panel. • Assessment of Alternatives – proposal is to change to 'better than the original proposal' rather than 'better than the baseline', from a point of view of developing an alternative. Discussion that this is the approach taken in the BSC. Could be difficult to decide if an alternative is 'better' than the 'original' until its been further developed. The aim is to develop only those proposals that are 'worthwhile' • Titles and Summaries. Provide a better more focused and balanced and summary. CA to be able to refine the description of the proposal • CA role – addressing the CA consultation responses. The idea of the CA Consultation is that it is a consultation on the very final solution – and that the solution can't be changed. Particularly a concern where there has been no WG. • Production of draft legal text. NGESO take the lead provided that is a clear intent / requirement • Governance. Prob would need at least one WG to refine these proposals, perhaps this could be self governance • GCDF feedback. <ul style="list-style-type: none"> ○ Some parties questioned whether any areas could be quick wins ○ Some parties wanted to retain NGESO mandatory workgroup participation ○ All were supportive of the principle of removing quoracy blockers – and wanted to include Ofgem approval/veto

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		<ul style="list-style-type: none"> for a non-quorate workgroup Some parties felt that development of extreme positions in alternatives was important – although developing a consensus view (as happened in the past) is probably better. Some discussion that NGESOs proposals tend to get approved by Ofgem Some parties felt that Code Administrator and Proposer need to agree titles and summaries Code Administrator Consultation clarifications – add an option to establish a workgroup to deal with changes if one was not formed previously Production of draft legal text at as early a stage as possible is useful but can only be when a solution has been formed Some parties felt that in addition to development by a workgroup, these changes were not suitable for self-governance by the Panel and should be determined by Ofgem Rob will provide a modified proposals to the Sept GCRP In summary the ideas generally seem reasonable, but they don't seem to be simple, or quick. Concern that if the industry doesn't engage with change – then BEIS/Ofgem will impose changes on the industry. Any comments on the proposal to RW
15 GCDF		<ul style="list-style-type: none"> RW Governance thoughts – see above NGESO Thought piece re the future of the GCode Legal Text drafting OC2 generator and voutage submission will now use REMIT interface and not TOGA Power Oscillation Damping innovation project. Potentially a new GCode requirement. Seemingly POD requirements can be added to a connection agreement – and nothing that needs to be added to the GCode. Any specification for POD needs to be transparent. GCDF 13 August no agenda items. Agreed to cancel WG days – 13/14 August. No WG meetings planned. Agreed to cancel
16 Standing Updates		<ul style="list-style-type: none"> DCRP Headline no DCRP since the last meeting JESG meeting in July, no August meeting
17 Horizon Scanning		<ul style="list-style-type: none"> Nothing new
18 CACoP update		<ul style="list-style-type: none"> OK
19 Customer Journey		<ul style="list-style-type: none"> Nothing new
19 AOB Code Review		<ul style="list-style-type: none"> Ofgem / BEIS consultation setting out possible new models. Codes to provide strategic direction, introduce

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Update		<ul style="list-style-type: none"> empowered Code management, introduce balanced decision makers – independent of industry etc Workshop to be arranged in due course – poss before the 16 September deadline
19 AOB Chris Smith		<ul style="list-style-type: none"> Requirement for Power Oscillation Damping set out in guidance notes that are not properly governed. Poss could be part of RES Simulation models (HVDC) – poss a Modification Proposal
19 AOB Metering Defects TNCC (NOC)		<ul style="list-style-type: none"> Relates to addressing metering defects To be circulated and published in the guidance section on NGE SO website
19 AOB definitions in the GCode		<ul style="list-style-type: none"> CMP199 related Poss housekeeping Some definitions either redundant or missing Note to be circulated round GCRP
19 AOB No Deal Brexit		<ul style="list-style-type: none"> Special meeting will be required 3 November
22 Meeting dates		<ul style="list-style-type: none"> 29 August 2019 26 September 2019 24 October 2019 Glasgow 28 November 2019 19 December 2019