

**Minutes**

**Meeting name** Grid Code Review Panel

**Meeting number** 18

**Date of meeting** Thursday 28 June 2018

**Location** National Grid House, Warwick

**Attendees**

<b>Name</b>	<b>Initials</b>	<b>Role</b>
Trisha McAuley	TM	Chair
Chrissie Brown	CB	Code Administrator
Naomi Davies	ND	Code Administrator
Gurpal Singh	GS	Authority Representative
Nadir Hafeez	NH	Authority Representative (observer)
Graeme Vincent	GV	Panel member
Alastair Frew	AF	Panel member
Alan Creighton	AC	Panel member
Kate Dooley	KD	Panel member
Lisa Waters	LW	Alternate Panel member
Jeremy Caplin	JC	BSC Panel member
Sigrid Bolik	GN	Alternate Panel member
Rob Wilson	RW	Alternate Panel member
John Martin	JM	GC0115 Proposer
Greg Heavens	RS	GC0116 Proposer
Garth Graham	GG	GC0117 Proposer
Mike Oxenham	MO	Sandbox Presenter

**1 Introductions**

TM commenced the Panel meeting with round table introductions and acknowledged advance apologies from Kyla Berry, Damian Jackman, Guy Nicholson and Steve Cox.

All Panel papers (PP) and presentations (Pr) referred to at this Grid Code Review Panel meeting can be found in the Grid Code Panel area on the National Grid website:

<https://www.nationalgrid.com/uk/electricity/codes/grid-code/meetings/grid-code-panel-28062018>

**2 Approval of March Panel minutes**

6010. Panel agreed to review the draft minutes as circulated/published and to feed back any comments by close of play on 5 July 2018

**3 Actions Log****Action 54**

6011. The panel were updated that it was proving difficult to source a suitable independent technical chair for workgroup GC0103, it was stated that a technical chair could be sourced from National Grid, but they would not be independent. The panel discussed this option and asked the Proposer of GC0103 if this was acceptable, GG confirmed he did not have a problem with this solution. The Panel then concluded, that an appropriate technical chair should be sourced from within National Grid and that this action should be expedited ahead of the next Workgroup meeting.

#### **Action 115**

6012. It was noted that RL had completed his action. CB added that there had been a large uptake for participating in this modification Workgroup and that she would be seeking Panel approval of membership later in the meeting.

#### **Action 117**

6013. RW stated that the most appropriate forum for this question would be the Operational Forum. He noted that this would be raised at the Forum (Wednesday 4 July) for a fuller discussion and fed back to DJ directly, ahead of further updates back to Panel. The action will remain open.

### **4 New Modifications**

#### **GC0115 Legal Separation Housekeeping Modification: 'NGET' to 'The Company'**

6014. JM presented [GC0115](#) as a follow up and more simple housekeeping modification to facilitate the development of GC0112 which was raised in May 2018. The presentation slides that were used in the meeting can be accessed [here](#). AC acknowledged the 26 documents that were circulated and highlighted the many mainly editorial issues that ran throughout the documents. Panel members were not satisfied with the readability of the documents. The Panel agreed that the Fast Track Criteria had been satisfied provided that adequate quality assurance is in place and the amended documents with the changes highlighted are circulated to Panel members.

**ACTION 122: GC0115 to be resubmitted to the Panel highlighting amendments made following feedback received from the Panel**

#### **GC0116 Correction to the compliance dates included in modifications GC0100-102 for the Requirements for Generators (RfG) and HVDC European Network Codes and other minor housekeeping changes**

6015. GH introduced [GC0116](#) as a housekeeping modification proposal necessary from the implementation of Requirements for Generators (RfG) and HVDC European Network Codes. The presentation slides used can be accessed [here](#).

6016. AF raised the issue of materiality of some of the proposed changes, specifically new text (Planning Code) and other textual changes that could be open to interpretation by industry and would affect how Panel approve the Self-

Governance Criteria. There was a general consensus on this issue by other Panel members.

6017. On behalf of the Proposer, RW acknowledged that what had been instructed was the date changes (by the Authority) but that NGET has sought to address other non-contentious issues which have also been incorporated into the proposal.
6018. Options were considered by the Panel in terms of progressing the housekeeping aspects of the current proposal. GS confirmed that the date change should be implemented as soon as possible.
6019. LW questioned whether aspects of GC0116 could be incorporated into an existing inflight modification. CB stated that each modification is required to be defect specific and the housekeeping Fast Track route is in place to assist with these type of amendments required.

**ACTION 123: Proposer (NGET) to split the modification into two or three modifications with the date changes (Fast Track) being tabled at the next Panel meeting**

**GC0117 Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Generating Modules (PGM) requirements.**

6020. GG as presenter for the [GC0117](#) introduced the modification proposal. Slides referred to by the Proposer can be accessed [here](#).
6021. GG stated that he would not be seeking to change the definition of 'substantial modification' as this had been addressed previously and that this modification would simply take the 'output' of that decision.
6022. RL sought clarity over what the physical reasons are to justify why those regional differences still exist. GV raised the need to be aware of technical differences between the networks in the regions and that the Workgroup will need to address this point. It was noted that some work had been progressed through GC0100 when banding was reviewed which addressed some of these technical considerations.
6023. LW voiced agreement with the principle of the modification and highlighted the activity of the DNOs and the link to the charging work.
6024. AF queried if the modification was only limited to new connections and not existing. GG confirmed currently this proposal was only aimed at new connections.
6025. The Panel agreed that this modification would need to be assessed by a Workgroup and sent to the Authority for approval.
6026. The Panel agreed their Terms of Reference for the Workgroup. This included ensuring that an appropriate cross section of representation was present at the Workgroup meetings as it was noted that although there may not be direct

changes to other codes the definitions used in the Grid Code flow through to other codes and all parties need to understand the potential impacts.

6027. The Panel noted that previous work carried out on this defect, for example CAP169, should also be reviewed within the Workgroup.
6028. AC questioned whether there should be an initial impact assessment of the modification carried out to understand the scope and scale of the defect which would then in turn assist the Panel in understanding the wider market implications.

## 5 Workgroup Reports

### GC0110 Limited Frequency Sensitive Mode – Over-frequency (LFSM-O)

6029. CB presented the [GC0110](#) Workgroup Report after it was formally raised to Panel in April. The presentation slides used ([Pr3](#)) demonstrated how the Workgroup has met their Terms of Reference. The Panel agreed that their Terms of Reference had been met and the Code Administrator Consultation could be issued in accordance with the timeline. It was noted that the Panel will be requested to undertake the Determination Vote in August. CB noted that references to the Distribution Code will be taken out of the current Workgroup Report ahead of issuing for Code Administrator Consultation.

## 6 Authority Decision

6030. CB updated the Panel re the decision received in respect of GC0099 (approval of WACM2), with Authority decisions now pending at the end of July for GC0097 and GC0104.

## 7 Current Modification Updates

### Prioritisation Discussions

6031. TM highlighted to the Panel that she had received three letters from Energy UK, The Flexible Generation Group and in addition the Independent Generation Group in relation to the prioritisation work that the Grid and CUSC Panels had undertaken recently. It was noted that these letters would be circulated to the Panel for their review. TM highlighted the intention to issue a formal written response and further engagement opportunities would follow to personally engage and listen to industry concerns.
6032. Prioritisation discussions preceded the updates in relation to all inflight modifications. LW made an immediate comment that the wider market does not support any aspect of prioritisation and considers it to be a barrier to entry. LW remarked that National Grid must resource the process accordingly. JC commented on the ESO Incentives Scheme suggesting this to be a reason to allocate additional resources into the Code Administrator function. Opportunities for the incentives scheme or other funding source to pay for the sector to engage would increase the efficiency and progress the work.

6033. TM highlighted the volume of change occurring across industry in addition to activity outside of the codes. An update was provided on the recent recruitment process with additional resource due towards the end of July and acknowledged the comment made by JC.
6034. RL highlighted the issue of Code Administrator resource as a cited blocker to progress, stating the value in understanding where prioritisation has stemmed from (ie. CA resource or industry time, etc.). He also highlighted an opportunity to review how Workgroup Days and other current processes can work differently. In addition, he stated that comparison with BSC team could be made to demonstrate how efficiencies can be made in the pre-modification/pre-Workgroup stage to save time in the change process.
6035. TM highlighted the Ofgem position that more transparency and accountability around decision making is needed. Prioritisation supports this approach to facilitate this.

**GC0109 The open, transparency, non-discriminatory and timely publication of various GC electricity warnings or notices or alerts or declarations or instructions or directions, etc. issued by or to the Network Operators**

6036. GG referenced the email requesting urgency which had been received by the Code Administrator on the 26 June 2018 noting that it was most appropriate to meet at the planned Panel meeting rather than set up another meeting to discuss the urgency request.
6037. GG stated that he was making a formal request on the grounds of the rationale outlined in the email (which can also be located in the urgency letter sent to the Authority on the GC0109 area of the National Grid website) TM noted the initial prioritisation of the modification and recognised the new considerations put forward by GG.
6038. RW asked what the commercial impact of this modification not being implemented by Winter 2018 would be. GG remarked that some parties have access to privileged information that other market participants do not have access to; he went on to provide an example regarding DNO instructions to customers that others do not have access to. He noted that equality of treatment of information is what is required.
6039. AF questioned what system information has the capacity to modify market behaviours and what information is not available. GG stated that whilst some of the information is available on BRMS, there is some information that some market participants do not have access to.
6040. LW referred to the impact on smaller parties, the impact on security of supply and their ability to self-despatch as an example of how parties make decisions based on availability of information. RL questioned whether information is withheld from market participants or not easily accessible. GG noted that this proposal will enable immediate access to the information and remove asymmetry.

6041. AC observed that the first criteria of 'significant commercial impact' within the Authority urgency criteria and its general application and relevance to all other modifications outside of any assessment of the 'urgency criteria'. CB noted that only this modification had been requested to be treated as urgent at this stage and therefore the Panel need to assess the request against the urgency criteria.

6042. RL questioned whether this is a defect in contractual conditions if certain information is not made available to parties with contractual arrangements. GG confirmed that attempts had been made via the bilateral agreement avenue but efforts have not been successful.

6043. The Panel carried out their recommendation vote (GR23) on the GC0109 request for urgency, this is detailed below.

Panel Member	Party	Support Urgency?	Reason
Kate Dooley	Generator	Yes	Supports urgency based on stakeholder feedback around commercial impact
Alastair Few	Generator	No	Part of ongoing workstream
Alan Creighton	DNO	Yes	Rationale provided by Proposer for commercial impact
Graeme Vincent	Onshore Transmission Owner	No	
Lisa Waters	Generator (Alternate)	Yes	Based on commercial impact today and this Winter it is more important due to the impact of weaker triad system
Sigrid Bolik	Generator (Alternate)	No	
Rob Wilson	NGET (Alternate)	No	It would be useful to have a draft solution to be able to expedite this. The reason that GC0110 has progressed quickly is that it started with a clear solution. GC0109 does not have an obvious solution and it is unclear whether all the warnings are within the Grid Code's jurisdiction.
Robert Longden	Supplier	Yes	Stakeholder impact
Chair	Chair	Yes	Stakeholder impact

6044. The Panel did not decide by majority whether the modification should be treated as urgent and therefore TM, as Chair, recommended that it should be treated as urgent when casting her vote. This resulted in the Panel recommending that the modification be treated as urgent. The Code Administrator will now draft a letter from the Panel to the Authority recommending urgency and await their decision.

The Panel assessed the GC0109 modification in terms of prioritisation and placed it below the compliance modifications but ahead of GC0096.

**CB used the presentation slides ([Pr4](#)) to talk through the modification updates for the Panel.**

#### **GC0096 Energy Storage**

6045. RW talked through GC0096 slides at the start of the presentation pack noting that the next Workgroup meeting is to be held on the 26 July 2018. LW questioned whether there are going to be any significant differences to the requirements on existing storage projects and is there anything that is required to be address from the storage licences from Ofgem? RW stated that he would take these points to the Workgroup for discussion on the 26 July 2018.

**ACTION 124: RW to take questions (*are going to be any significant differences to the requirements on existing storage projects and is there anything that is required to be address from the storage licences from Ofgem?*) to GC0096 Workgroup.**

#### **GC0105 System Incidents Reporting**

6046. ND updated the Panel on current status and Proposer request to put the modification on hold or to withdraw due to time constraints. ND stated that a formal request to place the modification on hold will be made at the next Panel meeting following discussion with the Proposer.

#### **GC0106 (Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL))**

6047. CB presented slides to outline current position and options discussed following the raising of the three WACMs at the Workgroup. It was noted that representatives of the Workgroup had met with the Authority to discuss the current position on the WACMs and the modification as a whole. GG stated that legal text for WACM2 (harmonisation) already exists (DRC, GC0106 Consultation Report page 6) but that the assessment and Impact would still be required. GG was asked as Proposer of the WACMs as to what their preference would be in terms of the options outlined and he stated preference for Option 3. CB stated that the Code Administrator preference was also for Option 3. RW agreed with the approach if the legal text is as the Proposer of the alternatives believes it to be, with only the threshold to be decided, however questioned whether it would be that simple. RL queried whether WACMs could be withdrawn. GG stated that he had considered this but would not be in a position to do so. It was noted that WACM1 was a legal question and as such we would need to allow time in the timeline for the modification to be sent back should WACM1 and WACM3 need fully working up with legal text ahead of the compliance deadline if required.
6048. CB highlighted that following the Workgroup Report being submitted to the Panel that a letter would need to be sent to the Authority outlining why the Panel have decided on option 3 as per GR21.5. CB took an action to draft this as soon as possible.

**ACTION 125: CB to draft Panel letter to Authority as per GR21.5 for GC0106**



## 9 Draft Self Governance/Final Modification Reports

### **GC0098 (Using GB Grid Code data to construct the EU Common Grid Model in accordance with Regulation EU 2015 1222 CACM and Regulation EU 2016 1719 FCA)**

6049. The Panel were asked to undertake the Determination Vote. The Panel voted unanimously in favour of the implementation of the modification and all voting preferences were recorded on the voting template to be added to the Final Self-Governance Report. Subject to no appeals being received, GC0098 will be implemented 10 working days afterwards. CB highlighted the implementation approach is being considered in light of other inflight modifications and whether a package of modifications can be processed as one update to the Grid Code.

### **GC0108 Emergency and Restoration: Black Start Testing Requirement**

6050. CB presented the draft [GC0108](#) Self-Governance Report and slides which can be accessed [here](#).
6051. AF expressed some dissatisfaction with the legal text – ‘Black Start Unit Test’ and ‘Black Start Station Test’, the latter is not sufficiently explicit in the text.
6052. The Panel had wider discussions around the feasibility of a second Code Administrator Consultation and the materiality of the modification. AF highlighted that testing requirement would be increased for Black Start providers and NGET, having to witness the tests. Currently testing is based on a station being tested every 2 to 3 years [the Grid Code requirement is for testing no more than every 2 years], however the new requirement to implement the Emergency & Restoration code requires a test of each Genset at least every 3 years, which dependent on the number of Gensets at a station could result in some sites requiring 4 tests in a 3 year period.
6053. After discussion, Panel agreed that the modification no longer satisfied the Self-Governance Criteria retracting their Self-Governance Statement and the modification will now be submitted to the Authority for their decision. The modification will now return to July Panel and further guidance to follow from the Code Administrator.

## 9 Electrical Standards and Governance

6054. None discussed at this meeting.

## 10 Grid Code Development Forum (GCDF) and Workgroup Day

6055. It was noted that the next Workgroup day scheduled for the 4 July would cover GC0111 and GC0106.

## 11 Reports to the Authority



6056. It was noted that the next Report likely to be submitted to the Authority would be GC0112 and GC0106.

## **12 Standing Items**

6057. These were noted and no comments made.

## **13 Impact of other Code Modifications or Developments**

6058. None discussed.

## **14 AOB**

6059. CB noted that the next Grid Code Panel election would be commencing shortly to be in post by 1 January 2019.

## **15 Next Meeting**

6060. The next Panel meeting will convene on **18 July 2018** at National Grid House and via webex.