

Grid Code Administrator Consultation Response Proforma

GC0133 – ‘Timely informing of the GB NETS System State condition’

Industry parties are invited to respond to this Code Administrator Consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5:00pm** on **2 April 2020** to grid.code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Draft Final Modification Report to the Grid Code Review Panel.

These responses will be included within the Final Modification Report which is submitted to the Authority.

Respondent:	<i>Rob Wilson</i>
Company Name:	<i>NGESO</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<ul style="list-style-type: none">(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and(e) To promote efficiency in the implementation and administration of the Grid Code arrangements

Q	Question	Response
1	<p>Do you believe that GC0133 better facilitates the Applicable Grid Code objectives? Please include your reasoning.</p>	<p>This is difficult to quantify as the proposer has not set out what stakeholders will do with the system state information or what positive steps, of benefit to the consumer, they may be able to take upon receiving it. Transparency as a principle is inarguable but there should be concern over whether this proposal represents value for money for consumers and whether it will actually help in the development and operation of a secure system.</p> <p>The 'system state' definitions were developed by ENTSO-E as part of the System Operation Guideline (SOGL) European Network Code and were intended to be a means of communication between TSOs concentrating in particular on cross-border issues. In doing this they directly action one of the recommendations of the report into the Nov 2006 European black-out (which led in part to the need for European Network Codes), one of whose causes was identified as a lack of communication and coordination between TSOs. During the drafting of SOGL some stakeholders, including SSE, lobbied for the system state information to be shared publicly. This was declined by ENTSO-E, in agreement with ACER and the European Commission, as it was intended that the system state would be very high level information really useful as part of targeted communications between TSOs only to improve European coordination in system operation.</p> <p>Of the system states, 'emergency', 'black out' and 'restoration' are all fairly analogous to similar GB conditions. There could be some benefit in sharing these if it could be done quickly and succinctly to aid communications during an emergency situation, and in such a way that it did not cause undue alarm or cause misreporting. It would require considerably more than just the actual state to be shared to do this.</p>

Q	Question	Response
1	<p>Do you believe that GC0133 better facilitates the Applicable Grid Code objectives? Please include your reasoning.</p>	<p>The 'alert' state, which in this modification will be reported as 'awareness', is of more tenuous value as it is caused by the triggering of one of a list of contingencies defined by each TSO to have potential cross-border impacts which typically includes things such as a loss of tools, loss of reserve or loss of a key transmission asset affecting cross-border security, flows or capability. The 'alert' status does not indicate an operational problem and does not indicate any likelihood that stakeholders will be required to take any action but just that were a further event to occur then this could push the system beyond operational limits and therefore raises awareness of this between TSOs.</p> <p>The modification is neutral against objectives (a) and (b) in neither facilitating development of the system nor competition in generation.</p> <p>Better communication during an emergency could highlight a positive against (c) in enhancing security of the system, although it is not particularly clear how, and if a benefit cannot be shown then it is negative against (d) in ultimately costing consumers money and impacting efficiency, and finally it is neutral against (e) in having no impact on code administration arrangements.</p>

Q	Question	Response
2	<p>Do you support the proposed implementation approach?</p>	<p>The ESO has confirmed the view of the Proposer that this modification as set out would be fairly easy to achieve as the system state is currently monitored and updated by the ESO through the ENTSO-E Awareness System which is a platform for information sharing with other TSOs used within the ESO Control Room. This would be done within Elexon's Balancing Mechanism Reporting Service (the BMRS). However, the basic system state information is at too high a level and would need to be set in context and expanded by the ESO to give a clear view of the reasons for a particular state having been entered and to manage any concerns that would otherwise be generated. An implementation date of perhaps 6 months after the code modification was approved would give the ESO time to develop, with stakeholders, the right messaging required to support the basic system state information and to make sure that this was suitable and limited the risk of misinterpretation.</p>

Q	Question	Response
3	Do you have any other comments in relation to GC0133?	<p>There is considerable potential for media misreporting¹ of the system state or for incorrect conclusions to be drawn from this, particularly when the system is in 'alert' state (reported in this modification as 'awareness'). The ESO is concerned over the potential for harm from this, and the lack of a tangible benefit or action that could be taken by stakeholders on receiving system state information, balanced against the understood requirements for increasing transparency.</p> <p>Work carried out of late on system warnings has included modifications initiated by BEIS to amend the names of system warnings to lessen the risk of misinterpretation – a NISM or Notice of Inadequate System Margin was changed to an Electricity Margin Notice in Sept 2016 under GC0093, and a modification to change a Gas Deficit Warning to a Gas Balancing Notification was approved by Ofgem in July 2019. Frequency events, and 'frequency near misses', are also a significant topic of current media attention.</p> <p>Two actions from the E3C final report on the power outage of 9 August 2019 also deal with communications:</p> <ul style="list-style-type: none"> • <i>Action 9: E3C, through the Communications Task Group (CTG), to develop and test a comprehensive communications strategy for use by industry and government</i> • <i>Action 10: E3C, through the CTG, to develop and test revised operational protocols and frameworks for communications between wider industry during incident response scenarios</i> <p>It is unclear whether this modification should be part of this strategy or not or how it would align.</p>

¹ An example of a consequence of misreporting was in the development of the European Network Codes, one aspect of which was intended to place a requirement on fridges to cut their compressors for a period of seconds during a low frequency event. This was reported in European papers [including GB](#) as potentially being a serious public health risk. In fact, consumers would have been unaware of any consequence; and for a fairly small initial cost the service would, once a sufficient volume of units was replaced, have had an annual benefit to consumers measurable in £00m's as well as enhancing security of supply. An average fridge compressor uses 150W of power and has a 33% duty cycle; assuming 20m households in GB and an average life of 15 years for a fridge then after 5 years this would have achieved a continuous response of about 300MW.

