

Code Administrator Meeting Summary

GC0160: Protecting Generators subject to Firm Load Shedding during a Gas Supply Emergency from excessive Imbalance Charges

Date: 6 October 2022

Contact Details

Chair: Milly Lewis, National Grid ESO Milly.Lewis@nationalgrideso.com

Proposer: Garth Graham, SSE Garth.Graham@sse.com

Key areas of discussion

The Workgroup discussions are summarised according to agenda items:

P448 solution and legal text – impacts on GC0160 continued

- A suggested legal text change to the BSC was 'Where the ESO is aware that Stage 2 of Network Gas Supply Emergency has been issued by the GSO is shall, without undue delay, make that available of BMRS. Where the ESO is aware that the GSO has instigated Stage 2 of Network Gas Supply Emergency load shedding it shall, without undue delay, make that available of BMRS.'
 - The NGENSO National Control confirmed that they make announcements on BMRS as per current set of warnings in the Grid Code, so if there is high risk of demand reduction, it will be made as is required currently.
 - Based on this feedback the Workgroup did not feel that a new modification needed to be raised, however there was not a consensus as to whether or not it should be included as part of the BSC P448 or GC0160 modification.
- Following on from the discussion around aggregated BM units it was suggested that an addition to the GC0160 legal text updates at the 'effected 'site or 'sites' rather than full BM unit.'
- Throughout Workgroup discussions the proposed P448 modification and proposed alternate solution and were brought back to the agreed draft legal text as a rational for the behaviour and use of Physical Notifications (PN) and the feedback from REMiT.

Grid Code GC0160 legal text drafting

- Following their review of the draft legal text the internal NGENSO Legal Team had suggested that rather than altering the definition of PNs that a 'Emergency Situation Post Physical Notification' was created specifically to address the issues of Gas Supply Deficit Emergencies and be defined within the Grid Code.
- Concerns were raised by the BSC SME that this would have a high impact on the BSC solution with a high level of change required within the BSC.
- The NGENSO Rep arranged a meeting post the Workgroup with the BSC SME and NGENSO legal team to find a resolution to align the Grid code and the BSC with minimal impact on both parties.

The output of this meeting would be shared with the Workgroup during the next Workgroup meeting.

- The Ofgem Representative fed back on their action around the use of PNs and confirmed that; REMIT requires (among other things) that market participants do not disseminate information which gives, or is likely to give, false or misleading signals as to the supply of, demand for, wholesale energy products. Where a generator is submitting physical notifications that are in line with its obligations under the Grid Code in the event of a gas emergency, this would not comprise a false or misleading signal. The Workgroup agreed that the draft legal text was in keeping with this ethos.

Next Steps

- The next joint workgroup meeting will take place on 7 October to gain refine the BSC solution, and comment on the workgroup consultation documents prior to issuing.

Action Log

Action Number	Workgroup raised	Owner	Action	Due by	Status
1	WG2	LM	Ofgem representative to check and guidance for the consultation on any concerns of change in PN definitions are misleading	WG3	Closed
2	WG2	ML	To gain NGESO legal review of the draft GC0160 legal text and share comments with the workgroup at the next meeting	WG3	Closed
3	WG2	ML	To add into the legal text the link to the E1 document	WG3	Closed
4	WG2	TB	To review the remaining Grid Code legal text to ensure no other areas where PN appears is impacted by this change in BC1.4.2 and BC2.5.1	WG3	Ongoing
5	WG3	CG/CP/T B	To discuss the potential impacts of the PN definition change within the Grid code and the proposed new 'Emergency situation post PN' on the BSC	WG4	Open

Participants

Attendees	Initial	Company	Position
Milly Lewis	ML	Code Administrator National Grid ESO	GC Chair
Ruth Roberts	RR	Code Administrator National Grid ESO	GC Technical Secretary
Garth Graham	GG	SSE Generation	Proposer
Andy Colley	AC	SSE Generation	Proposer Alternate
Chris Parsons	CP	National Grid ESO	Workgroup Member Alternate
Peter Frampton	PF	VPI Immingham	Workgroup Member Alternate
Paul Jones	PJ	Uniper	Workgroup Member
Paul Youngman	PY	Drax	Workgroup Member
Lisa Waters	LW	WatersWye	Workgroup Member
John Costa	JCosta	EDF Energy	Workgroup Member
Julie Cox	JC	Energy UK	GC Observer
Emma Burns	EB	Flexitricity	BSC Member/ GC Observer
Sarah Howarth	SH	BEIS	BSC Member/ GC Observer
Raoul Thulin	RT	RWE	BSC Member/ GC Observer
Phil Russell	PR	Independent	BSC Member/ GC Observer
Matthew Tucker	MT	Welsh Power	BSC Member/ GC Observer
Luke McCartney	LM	Ofgem	BSC Member/ GC Observer
Keren Kelly	KK	Elexon	BSC Chair
John Lucas	JL	Elexon	BSC SME
Tina Warth	TW	Elexon	BSC Legal
Stanley Dikeocha	SD	Elexon	ESC Analyst

For further information, please contact the Grid Code Administrator chair Milly Lewis.