

Grid Code Modification Proposal Form

GC0167: Material and Non Material Grid Code Changes

Overview: This modification is designed to address i) a number of appropriate changes identified following Grid Code Modification GC0136 (Non-material changes to Grid Code following implementation of the EU Connection Codes), ii) alignment in the requirements between the Connection Conditions and European Connection Conditions and iii) General House Keeping Changes

Modification process & timetable



Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route. The Proposer would recommend the Standard Governance route is adopted.

This modification is expected to have a: Medium impact

The ESO, Grid Code Users, Transmission Licensees

Modification drivers: Efficiency, Governance and Transparency

Proposer's recommendation of governance route

Standard Governance modification with assessment by a Workgroup

Who can I talk to about the change?

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What is the issue?

There are three issues which are driving this modification, but they all revolve around improving the consistency and clarity of the Grid Code. These include the following elements:-

- i) Corrections arising from issues identified outside the scope of Grid Code modification GC0136 (Non-material changes to Grid Code following implementation of the EU Connection Codes)
- ii) Alignment / Clarifications between the Connection Conditions and European Connection Conditions
- iii) Correction of housekeeping changes and typographical errors.

Why change?

The change is necessary to ensure consistency and clarity of the Grid Code and correct any known housekeeping errors.

What is the proposer's solution?

The Proposers Solution comprises three parts:-

- i) Address the outstanding issues raised following Grid Code modification GC0136. These are detailed in Annex 1 of this proposal form but in summary include the following elements:-
 - a. Glossary and Definitions - TERRE Gate Closure / Caution Notice / Consistency of SI units / Interconnector Scheduled Transfer / Intraday Cross-Zonal Gate Closure Time
 - b. Change Grid Code references of SHETL to SHET
 - c. Compliance Processes – CP.A.3.2.1 – Change from open loop response to closed loop response*
 - d. OC9.6.4 – Requires more work in formulation and to ensure the action is clear*
 - e. BC2.13 – Interconnector Scheduled Transfer / Intraday Cross-Zonal Gate Closure Time / relationship with Glossary and Definitions
 - f. Ensure consistency between Grid Code and G99
 - g. General Conditions - Re-word Paragraph GC.5.2 and GC5.4 and confirm if clauses GC11.2 and GC15.1 can be simplified

* These are potentially significant changes and may be outside the scope of this modification as specific workgroup representation would be required on these aspects.
- ii) Ensure consistency between the Connection Conditions and European Connection Conditions whilst ensuring Compliance with the European Connection Network Codes (ie RfG, DCC and HVDC). In summary this includes:-
 - a. Propose to remove thermal storage technologies in PC.A.3.4.1 eg Latent Heat Storage, Thermochemical Storage and Sensible Heat Storage
 - b. CC/ECC3.3.2 – Change GB Generator and EU Generator to Embedded Medium Power Station not subject to a Bilateral Agreement
 - c. Frequency Sensitive Relays CC/ECC.6.3.13
 - d. CC.6.3.12 prohibits the use of rate of change of frequency relays which was not carried over into the ECC's when RfG was implemented.
 - e. Mandatory Ancillary Services CC/ECC.8.1
 - f. Clarification required between CC/ECC.8.1 - CC.8.1 defines Ancillary Services requirements in terms of Large and Medium Power Stations and ECC.8.1 defines the requirements in terms of Type C and Type D Power Generating Modules.

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- g. ECP.A.6.8.1 Reword to improve clarity.
- iii) Address any outstanding housekeeping issues that have been identified as requiring correcting, eg incorrect diagrams, references, typographical errors, formatting etc. These are detailed in Annex 2. The high level elements include:-
- Incorrect diagram in Figure ECC.16.3.16(c) – Figure ECC.16.3.16(b) and (c) are the same and should use the diagrams approved in Grid Code modification GC0111.
 - There are two paragraphs with the same reference – ECP.A.3.6.7
 - References in ECP.A.6.8.1 which refer to ECP.6.3.2.5.2 or ECP.6.3.6.3 should be changed to **ECC.6.3.2.5.2** or **ECC.6.3.6.3**.
 - At the Grid Code Development Forum held on the 10th January 2024, the following additional items were also raised for consideration as part of this modification:-
 - Consider if Maximum Export Limit and other dynamic parameters should be formally defined as Grid Code definitions.
 - Ensure all tables in the Data Registration Code are in portrait rather than landscape.
 - Contents pages should be formatted to ensure they are consistent with page numbers.
 - Whether there is scope to change the definition of Seven Year Statement to Electricity Ten Year Statement.

As noted, some of these issues could be quite complex, requiring specific industry expertise to resolve. It is therefore proposed that as part of the Terms of Reference of this Workgroup, the Workgroup give due consideration as to which issues can be addressed by this workgroup based on its representation and which issues will require specialist knowledge and warrant a separate modification.

Draft legal text

The Legal text will be developed as part of the Workgroup.

The high level sections of the Grid Code legal text that need to be changed are included in the “Proposers Solution” above.

What is the impact of this change?

Proposer's assessment against Grid Code Objectives

Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Neutral By clarifying the Grid Code as indicated in the Proposers solution, it will improve clarity. This is marginally seen as positive overall but generally considered neutral in respect of this Grid Code objective.
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being	Neutral

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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);	By clarifying the Grid Code as indicated in the Proposers solution, it will improve clarity. This is marginally seen as positive overall from a competition perspective but generally considered neutral in respect of this Grid Code objective.
(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;	Neutral By clarifying the Grid Code as indicated in the Proposers solution, it will improve clarity. This is marginally seen as positive overall but generally considered neutral in respect of this Grid Code objective.
(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	Positive As the ESO is responsible for Administration of the Grid Code, improving clarity is a key objective and therefore we see this modification positive in respect of this Grid Code objective.
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive As the ESO is responsible for Administration of the Grid Code, improving clarity is a key objective and therefore we see this modification positive in respect of this Grid Code objective.

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

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Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Neutral This modification will improve clarity and ensure consistency between GB Code Users (ie pre European Connection Network Codes) and EU Code Users (ie post European Connection Network Codes). Whilst not having a direct impact on improved safety and reliability of the System, it will improve clarity which we overall see as positive.
Lower bills than would otherwise be the case	Neutral There will be no impact to lower Bills as a result of this modification.
Benefits for society as a whole	Positive The Grid Code is a complex document running to many pages. Any change which improves clarity to Stakeholders and User's is only seen as positive.
Reduced environmental damage	Neutral There will be no impact to environmental damage as a result of this modification.
Improved quality of service	Positive The Grid Code is a complex document running to many pages. Any change which improves clarity to Stakeholders and User's and hence the quality of service they receive is only seen as positive.

When will this change take place?

Implementation date

10 working days after an Authority decision.

Date decision required by

There is no specific back stop date required for this modification. However the Workgroup should aim to complete this modification in a timely manner. We can expect to submit the final modification report to Ofgem in Q4 2024.

Implementation approach

The implementation approach will seek to identify what issues can be addressed from within the expertise of the Workgroup. Any issues which require specialist knowledge or in-depth study work will need to be addressed through a separate Grid Code modification.

Proposer's justification for governance route

Governance route: Standard Governance modification with assessment by a Workgroup.

Many of the issues identified as part of this modification are of a material nature which require assessment and scrutiny by the wider industry. We therefore recommend that the Standard Governance route is adopted which will result in Workgroup assessment and a subsequent Consultation.

Interactions

☐ CUSC ☐ BSC ☐ STC ☐ SQSS
☐ European ☐ EBR Article 18 ☐ Other ☐ Other
 Network Codes T&Cs¹ modifications

None

Acronyms, key terms and reference material

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
EBR	Electricity Balancing Regulation
GC	Grid Code
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

¹ If your modification amends any of the clauses mapped out in Annex GR.B of the Governance Rules section of the Grid Code, it will change the Terms & Conditions relating to Balancing Service Providers. The modification will need to follow the process set out in Article 18 of the Electricity Balancing Regulation (EBR – EU Regulation 2017/2195). All Grid Code modifications must be consulted on for 1 month in the Code Administrator Consultation phase, unless they are Urgent modifications which have no impact on EBR Article 18 T&Cs. N.B. This will also satisfy the requirements of the NCER process.

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TERRE	Trans European Replacement Reserve Exchange (TERRE) European project to implement a Replacement Reserve (RR) balancing product
SI Unit	International System of Units
SHETL	Scottish Hydro-Electric Transmission Limited
SHET	Scottish Hydro-Electric Transmission
RfG	Requirements for Generators Network Code (Commission Regulation (EU) 2016/631)
DCC	Demand Connection Code Network Code (Commission Regulation (EU) 2016/1388)
HVDC	High Voltage DC Network Code (Commission Regulation (EU) 2016/1447)

Reference material

- Annex 1 – Summary of Housekeeping changes Post GC0136
- Annex 2 – Copy of Housekeeping Register