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Grid Code Alternative Form

GC0183 Alternative Request 1: Deviation from best estimate position

Overview: GC0183 is premised on obligating Generators, Interconnector Owners and Restoration Contractors (“Market Parties”) to notify the NESO of their best estimate intended position in the event of severe space weather. Whilst we are supportive of this aim, the existing draft legal text of GC0183 is seeking to go beyond this requirement by compelling Market Parties to notify the NESO of their best estimated position and then maintain that position for an undefined period of time. The proposed Workgroup alternative is seeking to amend the legal text of clauses BC1.9.1(b) and BC1.9.2(b) proposed under the Original proposal, by allowing Market Parties to deviate from the best estimate position they declared in their Space Weather Output Useable Declaration in the event it is prevented from so doing as a result of an unavoidable event that emerges (i.e., plant breakdown, safety grounds).

Proposer: Patrick Murphy, Eleclink

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What is the proposed alternative solution?

This proposal is seeking to amend the existing legal wording proposed for GC0183, to allow Market Parties to deviate away from their previously declared Space Weather Output Useable Declaration in the event it is no longer practicable and/or safe to maintain that position. For example, a Market Party may have intended to keep its asset operational, but had to deviate and undertake an outage following unexpected effects being experienced that could now jeopardise the integrity of the asset, and/or the safety of operational staff/members of the public in the vicinity.

The proposal seeks to update Grid Code clauses BC1.9.1(b) and BC1.9.2(b) as follows, however, an alternative approach could be the insertion of a new clause.

BC1.9.1(b)

where a **Space Weather Possible Notification** is issued by **The Company** in accordance with OC7.4.9, comply with their submitted **Space Weather Output Usable Declaration**, *unless prevented from so doing as a result of an unavoidable event in relation to that **BM Unit** (or a **Generating Unit**) which requires a variation in output or input of that **BM Unit** (or a **Generating Unit**).*

Examples (on a non-exhaustive basis) of such an unavoidable event are:

Plant breakdowns; events requiring a variation on safety grounds (relating to personnel or plant).

BC1.9.2(b)

comply without undue delay with their **Space Weather Output Usable Declaration** as submitted in accordance with BC1.9.2(a), *unless prevented from so doing in accordance with BC1.9.1(b).*

What is the difference between this and the Original Proposal?

I believe that this proposal facilitates the Objectives to the same level, but is more in keeping with the intent of the Original proposal, which only sought to make it mandatory for the provision of information to the NESO.

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What is the impact of this change?

I believe that the intent of GC0183 can still be achieved to the same degree (i.e., the insertion of a requirement into the Grid Code to make information available to the NESO), but that Market Parties will not be at risk of breaching the Grid Code in the event they are unable to maintain their 'best estimate' position in the event of safety grounds.

Proposer's assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(i) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;	Positive The timely provision of critical operational information related to a space weather event will enable NESO to operate the system if this situation arises.
(ii) 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);	Neutral
(iii) 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;	Positive The modification aims to ensure that NESO, has visibility of the intended positions of Generators and Interconnector Owners following the

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	notification of a severe space weather event.
(iv) 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	Neutral
(v) To promote efficiency in the implementation and administration of the Grid Code arrangements	Neutral

* See Electricity System Operator Licence

When will this change take place?

Implementation date: As per the GC0183 Original solution.

Implementation approach: As per the GC0183 Original solution.

Acronyms, key terms and reference material

Acronym / key term	Meaning
BCI	Balancing Code 1
GC	Grid Code
NESO	National Energy System Operator