

GC0119:

Mod Title: Post Open Governance Implementation Housekeeping Changes

What stage is this document at?

01

Draft Grid Code Modification Fast Track Report

02

Approved Grid Code Modification Fast Track

Submission Date: 10 July 2018

Details of proposer: Joseph Henry, National Grid

Published on: 17 July 2018

Objection Window Opens: 19 July 2018

Objections Window Closes: 09 August 2018

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Any Questions?

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About this document

This Grid Code Modification Fast Track Proposal was presented to the Grid Code Panel on 18 July 2018.

The Grid Code Panel agreed with the Proposer's view, and agreed whether that is a Grid Code Modification Fast Track Proposal and agreed to implement the modification subject to the standard 15 working day objections window.

Document Control

Version	Date	Author	Change Reference
0.1			Grid Code Modification Fast Track Proposal Report

1 Why Change

What?

Upon approval and implementation of GC0086 – Open Governance, Ofgem have given instruction for a housekeeping Modification to be raised in order to address minor typographical errors and to ensure clarity.

The typographical errors currently impact several Grid Code Processes, and need to be amended due to their impact on the way the code is applied. There are currently six such typographical changes which this modification looks to implement, which are further detailed in Section 07 of this modification proposal and the associated legal text.

Why?

This change is required to ensure the Grid Code Governance Rules are correct and consistent.

How?

The Grid Code Governance Rules should be updated to ensure it is consistent and factually correct throughout.

2 Solution

The Grid Code Governance Rules should be updated to ensure it is consistent and factually correct throughout by making the following changes:

The Grid Code Governance Rules should be updated to ensure a consistent process is followed by making the following changes:

1. To clarify that the Panel cannot reject a Modification raised by the Authority.
2. To clarify the legal text of the withdrawal process for Ofgem raised SCR Modifications.
3. Clarification that Ofgem can attend Workgroups.
4. Remove a superfluous reference to the election of Alternates.

3 Proposed Legal Text Implementation

Please see Annex 1

4 Grid Code Panel Approval

- 4.1 On 18 July 2018 the Grid Code Modifications Panel considered whether GC0119 meets the fast track criteria (and self-Governance criteria) and whether the Grid Code Modification should be made.

The Panel agreed that GC0119 met the Grid Code Modification Fast Track Proposal if implemented would meet the Fast Track Criteria as detailed below as well as the self-Governance criteria.

Fast Track Criteria

Fast Track Criteria A proposed Grid Code Modification Proposal that, if implemented,

- (a) would meet the Self-Governance Criteria; and
- (b) is properly a housekeeping modification required as a result of some error or factual change, including but not limited to:
 - (i) updating names or addresses listed in the Grid Code;
 - (ii) correcting any minor typographical errors;
 - (iii) correcting formatting and consistency errors, such as paragraph numbering; or
 - (iv) updating out of date references to other documents or paragraphs

Self-Governance Criteria

A proposed Modification that, if implemented,

- (a) is unlikely to have a material effect on:
 - (i) existing or future electricity consumers; and
 - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity; and
 - (iii) the operation of the National Electricity Transmission System; and
 - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
 - (v) the Grid Code's governance procedures or the Grid Code's modification procedures, and
- (b) is unlikely to discriminate between different classes of Users

5 Proposed Implementation

- 5.1 It is proposed that the GC0119 Grid Code Modification Fast Track Proposal is implemented on the day after publication of the approved Grid Code Modification Fast Track Report providing no objections have been raised as per the objection process described in GR26.

Date	Activity
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18 July 2018	Draft Grid Code Modification Fast Track Proposal Report presented to the Grid Code Panel
19 July 2018	Publish approved Grid Code Modification Fast Track Report
09 August 2018	Appeal window closes
10 August 2018	Code Administrator implement GC0119

6 Objections (as per section GR26 of the Governance Rules)

- 6.1 If GCO119 is approved by the Grid Code Modifications Panel, you will have the opportunity to raise an objection to the Modification.
- 6.2 The Approved Grid Code Modification Fast Track Proposal will not be implemented if an objection is received.
- 6.3 The Grid Code Panel Secretary will notify the Grid Code Panel, the Authority and Grid Code Parties if an objection is received.
- 6.4 The Grid Code Panel Secretary shall notify the proposer that additional information is required if the proposer wishes the Grid Code Fast Track Modification to continue as a Grid Code Modification Proposal.

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GR.15.6 Without prejudice to the development of a **Workgroup Alternative Grid Code Modification(s)** pursuant to GR.20.10 and GR.20.15, the **Grid Code Review Panel** shall direct in the case of (a), and may direct in the case of (b), the **Panel Secretary** to reject a proposal pursuant to GR.15, other than a proposal submitted by **NGET** pursuant to a direction issued by the **Authority** following a **Significant Code Review** - in accordance with GR.16.4 ~~(b)~~, or an Authority Led modification, if and to the extent that such proposal has, in the opinion of the **Grid Code Review Panel**, substantially the same effect as:.

GR.15.6 Prevents the Panel refusing the raising of a mod by NGET at the Authority's direction, but should also include Authority-raised mods.

GR.16.4 c) it is raised by the **Authority** pursuant to GR.15.1(c)(iii) ~~GR15.1(c)(i)~~ who reasonably considers the **Grid Code Modification Proposal** to be necessary to comply with or implement the **Electricity Regulation** and/or any relevant legally binding decisions of the European Commission and/or the **Agency**; or

GR.16.4(c) refers to GR.15.1(c)(i) in relation to code mods required by EU law but GR.15.1(c)(i) concerns SCR-derived code mods. It is GR.15.1(c)(iii) that concerns code mods required by EU law so this cross-reference should be amended.

GR.19.1 (a) The **Code Administrator** and the **Grid Code Review Panel** shall together establish a timetable to apply for the **Grid Code Modification Proposal** process. That timetable must comply with any direction(s) issued by the Authority setting and/or amending a timetable in relation to a Grid Code Modification Proposal that is in respect of a Significant Code Review.

Ofgem suggested compliance with an Authority directed timetable should be explicit in the code because it is a requirement contained in the licence (see SLC C14 2A(f)).

GR.20.9 Subject to the provisions of this GR.20.9 and unless otherwise determined by the **Grid Code Review Panel**, the **Workgroup** shall develop and adopt its own internal working procedures for the conduct of its business and shall provide a copy of such procedures to the **Panel Secretary** in respect of each **Grid Code Modification Proposal** for which it is responsible. Unless the **Grid Code Review Panel** determine otherwise, meetings of each **Workgroup** shall be open to attendance by a representative of any **User**, (including any **Authorised Electricity Operator**; **NGET** or a **Materially Affected Party**), the **Citizens Advice**, the **Citizens Advice Scotland**, the Authority and any person invited by the chairman, and the chairman of a **Workgroup** may invite any such person to speak at such meetings, other than the authority who may speak at any time as per GR20.3.

GR.20.9 does not explicitly allow for Ofgem to attend Workgroups and so the Authority should be added.

GR.7.2 Alternate(s): other Panel Members.

- (a) At the same time that the parties entitled to vote in the relevant election appoint **Elected Panel Members** under GR.4.2(a), they shall appoint the following **Alternate Members** ~~in accordance with Annex Gr.A~~

The election process at GR.A doesn't refer to the election of Alternates as indicated at GR.7.2.