

Minutes

Meeting name	GC0048: Joint GCRP/DCRP Workgroup on National Application of RfG
Meeting number	15
Date of meeting	19 November 2015
Time	10.00 – 15:00
Location	National Grid House, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

Attendees

AC	Alan Creighton	Northern Powergrid
AD	Amir Dahresobh,	Nordex
AF	Alastair Frew	Scottish Power
AV	Andy Vaudin	EDF
CW	Chris Whitworth	AMPS
CM	Campbell McDonald	SSE
DS	Dave Spillett	ENA
GM	Greg Middleton	Deep Sea Electronics plc
JD	Joe Duddy	RES
JN	John Norbury	RWE
KP	Konstantinos Pierros	Enercon
LR	Lesley Rudd	Sustainable Energy Association
MB	Mick Barlow	S&C
MBe	Matthew Berry	Ofgem
PG	Paul Graham	UK Power Reserve
SC	Sarah Carter	Ricardo
SD	Steve Davies	DECC
SP	Stephen Perry	Ofgem
RJW	Richard Woodward	NGET
RW	Rob Wilson	NGET – Chair
AJ	Antony Johnson	NGET
HH	Honor Hynes	NGET Tech Secretary

1 Introductions

RW

RW welcomed attendees to the workgroup and outlined the main objective for the meeting to progress the work group report on RfG Banding options.

RW reminded the group that RfG had been voted on by member states on 26 June 2015 and Entry Into Force (EIF) was likely to be in February/March 2016. Following EIF, GB would have a maximum of two years for implementation. The plan was however to progress the implementation requirements as far ahead of this deadline as possible to maximise the time available to industry in achieving compliance.

RW set out that the objective was to finalise the work group report on banding by the end of December. The report would be developed into an industry consultation followed by a report to the Authority. Ofgem cannot publish a decision until EIF and therefore would be unable to accept an official report before then, however the intention is to submit a draft to allow consideration as soon as possible and ahead of EIF.

2 Stakeholder Representation

RW

RW raised the standing agenda item on effective representation, particularly from manufacturers and smaller parties. RW also took the opportunity to welcome back LR.

Regarding solar representation, SMA and ABB are on the GC0048 distribution list and LR and DS reported that they have solar industry members in their organisations and keep them informed/involved.

AF commented on the lack of TO representation. SHET had provided feedback on the banding survey and RJW confirmed that he was further engaging with Scottish TO's to encourage greater involvement.

Action RJW to liaise and progress Scottish TO representation issue.

3 Review of Actions & Approval of Minutes

HH

JD had commented on Action 13 from the last meeting (Meeting 14) minutes noting that this seemed to cover TO connection offers only, while DNO connection offers also needed to be covered.

See Action 13 below.

Action HH to publish the Meeting 14 minutes.

Actions

13. RfG timescales within connection offer documentation. AJ reported that following further discussion it had been concluded that the most efficient way to address all customers was via an open letter on the NG website in early 2016. In addition, this letter would be referenced in all offer documentation. AC reiterated JD's point that a similar action would be required for DNO offers but that it would be best if this was undertaken on the back of National Grid's open letter. CM commented that developers need this information as soon as possible. RW agreed but added that really most parties should be aware by now.

25. Future Compliance Regime Update. Ongoing

69i-v. Banding actions to be reviewed following workgroup report.

81. Information on the number of LEEMPS stations, what their obligations are for providing frequency response, or where there are derogations from this. To be reviewed following workgroup report.

83. DECC/Ofgem to provide guidance on Relevant System Operator compliance testing to give assurance to generators that costs would be managed. To be included in the compliance work stream. Ongoing

84. Responsibility between TSO and DNOs to conduct compliance testing. DNOs to agree costing model. MK had sent costings for compliance testing via email on 19 November and had also noted in his email 'There is one key cost driven by banding that has not been picked up anywhere I think and this is the costs of operational metering'.

86. RJW's action to extract code mapping exercise into mod-specific reports covered under project plan. RJW asked if this was required. The info can be extracted from the mapping spreadsheet by filtering. See Action 88.

88. HH had circulated draft ToRs for RfG work streams and asked the group to provide feedback. It was agreed that code mapping references should be added to the ToRs and the mapping spreadsheet re-circulated to the group and to allow in particular a review/check of workstreams.

91. Previously closed. Slide 48 of the ECCAF November 13 presentation identifying how many EU codes will impact the GC can be viewed via the link below.

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=29049>

CM commented on the need to update this slide. RW added that the slide had been created at an early stage and agreed that it needed to be updated but this should also include showing where the tasks are going to be undertaken.

92. Central framework for the connection code. Ongoing.

RW commented that coordination work across the 3 connection codes would follow code mapping – DCC code mapping is still to take place. SP highlighted that timescales need to be slightly different to existing Grid Code modifications. It was agreed that it would be worthwhile creating an oversight group to facilitate this coordination which could possibly fill a short slot at the beginning of the two day meetings in 2016. **Action** RJW to draft an outline proposal for the new group to take to GCRP, DCRP and JESG.

94. G98 AJ has sent comments to SC. Close

100. Ofgem to provide update on guidance for those wishing to be considered as an Emerging Technology. Covered under Item 4.

101. Ofgem to seek legal advice on timescales for modifications approval and implementation. (eg 'go live' , 'go active' dates). SP fed back that the Authority would not issue any decisions ahead of EIF due to the risk of the Commission changing the code. RW agreed though that it would be worth doing all the work including sending a draft report to Ofgem but then leave the final submission until EIF.

102. HH had circulated dates for two day meetings for 2016. Calendar appointments and agendas will follow. It was noted that RfG would take place on day 1 of the first few meetings. CM asked whether RfG subgroups could also be covered on day 1 due to travel. Further detail on how the two day plan will work still needs to be developed and will include consideration of the coordination required across the 3 Connection Codes and the common areas that need to be addressed in these. Ongoing.

103. AJ sent requested slides to CW. Close

104. Draft Workgroup report on banding has been circulated. To be reviewed under item 7. Close.

4 Progress Update

DECC/Ofgem

Emerging Technologies in RfG - MBe presented slides explaining the draft approach. LR clarified the background to this work which was originally with regard to CHP. The objective was to give emerging technologies a period of exemption to allow time to develop a technical solution to compliance. RW referenced RfG Article 68 which indicates that the manufacturer would apply to be considered as an emerging technology.

ACTION SP to check with legal whether all manufacturers of each technology would need to apply to be considered an emerging technology.

Ofgem are looking to resolve the general issue of how compliance with RfG for Band A (licence exempt) can be enforced.

SC asked Ofgem to check Appendix 1 of G98 to see if this is appropriately covered.

Action Ofgem to circulate the source data of the 0.1% figure for each synchronous area from the ENTSO-E web site.

DS asked whether sales information would be confidential. SP replied that Ofgem are required to provide cumulative figures and the details of which products are exempt.

MBe referred to the next steps on the slides and asked if the group could provide feedback on this draft process. **Action All**

5 Project Plan Update

The project plan had not changed since the previous meeting.

There was further discussion on the need for cross code coordination.

As agreed under Action 88, ToRs would be updated to include code mapping references and re-circulated for comment.

Action All – provide feedback on ToRs and indicate whether you would like to sit on a particular modification group. This would be useful in planning next year's meeting content.

Action RJW/HH – re-issue ToRs ahead of December meeting.

JN suggested that each workgroup should go through a consistent process eg following the same steps.

Action RW to check this approach at the November GCRP.

6 G99 document for Type A and B generators

SC

SC had circulated G98 for comment. This references BSEN50438. SC pointed out that the new documents leave spaces for the new parameters to be filled in – once banding thresholds are agreed. G99 is still being drafted and will be circulated soon. Connection guides to accompany G98-1 and -2 are also in progress.

For G99, SC noted that the aim was to combine requirements with G59. Banding thresholds will feed into this.

DS confirmed that G83 and G59 are owned by the DCRP although administered by the ENA. It was also explained that TS50549-1 and -2 are European requirements for connection up to 36kV.

SC also commented on the issue of nomenclature, for example - DC does not currently refer to PPMs whereas GC does. SC acknowledged the need to consider alignment with RfG and GC definitions. This will be covered in mod 3 General workgroup and needs to be consistent across types A-D and across DC/GC.

7 RfG Banding Workgroup Report

RJW

RJW had drafted and circulated the workgroup report on RfG banding looking at the options below.

	High Option (Existing RfG CE levels)	Mid Option	Low Option Similar to Irish levels
A	800W – 1MW	800W -1MW	800W – 1MW
B	1-50MW	1-30MW	1 – 5 MW
C	50-75MW	30-50MW	5 – 10MW
D	75MW	50MW+	10MW+

RJW asked the work group for feedback as to whether the structure/approach is correct and reminded the group that the aim was to finalise a report in December. RJW also asked for suggestions and contributions to fill in the gaps in the report.

AV asked whether a CBA for justifying the banding setting was a code requirement. RJW confirmed that the code did not require a CBA, but the workgroup in general advocate this approach as it should lead to a robust justification. RJW however challenged the workgroup to provide the other side to the SO costs (e.g. operational costs and any CAPEX costs for compliance), otherwise any CBA would be one-sided. AV and RJW agreed that these needed to be incremental costs to be valid for use with banding.

SP stressed that the cost impact of the proposals would be required in order for Ofgem to make a decision, and explained why a CBA is preferable for this

RW confirmed that the Code does not mandate a CBA for the initial setting of the banding thresholds but does require justification to be provided by the TSO and approved by the NRA. The reason for this is that during the drafting it was acknowledged that providing a CBA could be unnecessarily complex. In the event that the banding thresholds require subsequent adjustment a CBA is however required to apply this retrospectively.

JN suggested producing a merit order stack for 2020 which would show splits by type and critical measures needed to secure the system.

CM queried what assumptions were being made eg Does the report assume that interconnectors are not being utilised for frequency response?

SP pointed out that the sooner costs/assumptions are fed into the consultation then the more time industry will have to digest and comment.

JD referred to work in progress in Ireland.

Post meeting: JD circulated the following link to the Irish consultation which includes a description of their proposed methodology for determining the volumes of services (including frequency reserves) they will need in future

[DS3 System Services Volume Calculation Methodology and Portfolio Scenarios](#)

RW reminded the group that, if GB decided on thresholds as CE, this decision would still need justification.

RW observed that the B/C threshold is likely to have the most significant impact.

The group raised several concerns on the requirements in the SO GL and the interaction with RfG. RW asked whether SO GL can be considered separately to the Banding workgroup report.

Action SP to follow up new/existing RfG issues/references in SO GL.

RJW requested more views from stakeholder groups on each option. Without all the numbers/costs some text/opinions would be a good starting point.

There was a discussion as to whether the FES was the best data source (or week 24). It was agreed FES was preferable as it is publicly available and SOF can advise on operability.

Action AJ to check whether Wk 24 data is confidential – even when totalled.

AF commented that looking at the FES predictions for 2021, there is only a 6MW difference in response capability between the high and mid option choices of B/C thresholds.

RW commented that although there is little difference at this point, the banding thresholds used may have an influence on the size of generation wishing to connect in the future.

SP suggested adding GC and DC objectives against each of the three options in the report.

AF re-iterated the need for a TO contribution, particularly on voltage support.

AV pointed out that the TO's may also have a view on synthetic inertia which is significant for Band C level.

JD noted that NG has already carried out studies to show that FFR can be a substitute for inertia. The Irish have more of an issue with this and are seeking to deal with it by defining a commercial service rather than making it a mandatory service.

SP asked if comments in the report could be substantiated by costs eg.

- Balancing costs
- Commercial relationships
- Compliance testing

RW noted again that any costs would have to be reciprocal.

Action All Provide comments marked up on current first draft of the report plus any costings by **Friday 27 November**.

Action RJW Circulate updated draft banding report by **Friday 4 December**.

Action All Comment on second draft by **Thursday 10 December** (deadline for pre-meeting material). The aim is for the report to be almost complete by this stage to be finalised at the next meeting on 17th December.

RW reminded everyone that once decided the levels will be set for at least three years after EIF and stressed again the importance of the banding report reflecting everyone's views - not just NG.

For information, KP reported that FNN in Germany had just decided (although not yet officially concluded) on the following banding thresholds:

- Type B 100kVA
- Type C 40MVA
- Type D 50MVA

8 Risk Register

RJW

Action RJW/HH SO GL interaction issues to be added following NG/Ofgem/DECC meeting on 24th November.

9 DECC/Ofgem Steering Group Reporting

JR/SP

Next Group meeting is in December. Proposal as previously to flag the banding discussions to the Steering Group.

10 Agree Actions

HH

See action log.

11 AOB / Next Meeting

All

AOB

Multiple TSOs

RW presented slides on the issue of allocating actions to relevant TSOs and relevant System Operators in GB. This included the assumptions used in NG's first view of these.

SP asked for feedback on the spreadsheet to Ofgem by 2nd January. This was circulated to the workgroup by HH on 13/11/15. CM commented again on the lack of Scottish TO and OFTO presence where they are relevant to this discussion. It was confirmed that the resulting information would be published separately to the open letter/offer letters on RfG.

Action All - comments to Ofgem by 2nd January

Next Meeting:

The next RfG Workgroup meeting will take place on **Thursday 17 December**, at **National Grid House, Warwick and starting at 10am**.