# At what stage is this document **Code Administrator Consultation** in the process? **Proposal Form** GC0135 01 Code Administrator Mod Title: Removal of Consultation **Redundant Provisions Draft Grid Code Modification Self** Governance Report **Final Grid Code** 04 **Modification Self** Governance Report Purpose of Modification: As a result of BSC Modification Proposal P394 raised by Elexon, this modification is being raised to remove some redundant provisions from the Grid Code. The BSC Modification if passed will render the references included within this proposal wholly obsolete. The purpose of this document is to consult on GC0135 with Grid Code Parties and other interested industry members. Parties are requested to respond by 5pm on 21 January 2020 to grid.code@nationalgrideso.com using the Code Administrator Consultation Response Pro-forma which can be found via the following link: https://www.nationalgrideso.com/codes/grid-code/modifications/gc0135-removalredundant-provisions Published on: 18 December 2019 **Length of Consultation: 20 Working days** Responses by: 5pm on 21 January 2020 High Impact: None. **Medium Impact** None. Low Impact All parties.

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## Timetable

## The Code Administrator recommends the following timetable:

Code Administrator Consultation issued to the Industry for 20 working days	18 December 2019
Code Administrator Consultation closes	21 January 2020
Draft Self Governance Report presented to Panel	22 January 2020
Modification Panel Self-Governance Vote	30 January 2020
Appeal window (15 working days)	10 February 2020 to 5pm 2 March 2020
Decision implemented in Grid Code	3 March 2020



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# Proposer Details

Details of Proposer: (Organisation Name)	National Grid ESO
Capacity in which the Grid Code Modification Proposal is being proposed: (e.g. CUSC Party)	The Company
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Matt Baller National Grid ESO 07866 197 575 Matt.baller@nationalgrideso.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Robert Wilson National Grid ESO 07799656402 Robert.wilson2@nationalgrideso.com
Attachments (Yes/ <del>No</del> ):  If Yes, Title and No. of pages of each Attachment:	

# Impact on Core Industry Documentation.

Please mark the relevant boxes with an "x" and provide any supporting information

BSC	Χ
CUSC	
STC	
Other	

We do not believe there will be any impact on the CUSC or STC as a result of this modification.

### 1 About this document

GC0135 was proposed by National Grid Electricity System Operator and was submitted to the Grid Code Review Panel for its consideration on 29 October 2019. The Grid Code Panel unanimously agreed that this Modification met the self-governance criteria and agreed to send GC0135 straight to Code Administrator Consultation for 20 Working days.

This Code Administrator Consultation has been prepared in accordance with the terms of the Grid Code. An electronic copy can be found on the National Grid ESO's Website, <a href="https://www.nationalgrideso.com/codes/grid-code/modifications/gc0135-removal-redundant-provisions">https://www.nationalgrideso.com/codes/grid-code/modifications/gc0135-removal-redundant-provisions</a>, along with the Grid Code Modification Proposal Form.

### 2 Original Proposal

#### **Defect**

Balancing and Settlement Code (BSC) <u>Modification P394</u> proposes to remove references to **Quiescent Physical Notifications (inclusive of its abbreviated form "QPNs")** and **Joint BM Units** from the BSC. As a consequence, the use of these terms within the Grid Code will be rendered redundant and should be removed for clarity.

#### What

The proposed modification aims to amend the Grid Code to remove the terms **Quiescent Physical Notifications** and **Joint BM Units.** Further minor amendments are required to ensure continuity and consistency of language where applicable entries are deleted. Please see the proposed legal text (Section 9 of this report) for the list of proposed changes.

## Why

The BSC modification P394 will remove references to **Quiescent Physical Notifications** and **Joint BM Units.** This is a consequential modification to remove these terms from the Grid Code avoid unnecessary confusion for market participants when reading the Grid Code.

#### How

All references to **Joint BM Units**, **Quiescent Physical Notifications** (including entries for "QPN" and "QPNs") will be removed from the Grid Code.

#### 3 Governance

#### **Justification for Self-Governance Procedure**

As the proposed changes are not expected to be material (see section 3 below for the rationale), the Proposer believes that this modification can be considered under the self-governance modification route.

The Self-Governance route may be used where the modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- Existing or future electricity customers;
- Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,
- The operation of the National Electricity Transmission System
- Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies

The Grid Code's governance procedures or the Grid Code's modification procedures

In addition, the proposer believes a workgroup is not necessary in this instance as this is a simple, non-contentious, consequential modification from a BSC change (P394).

### 4 Why Change?

The commentary below is quoted from BSC Proposal P394, outlining why the affected sections are to be removed from the BSC. This reasoning equally applies to the changes proposed within this modification in terms of why the proposed changes are immaterial.

#### **Quiescent Physical Notifications (QPNs)**

QPNs were introduced as part of the New Electricity Trading Arrangements (NETA) in March 2001, to facilitate Balancing Mechanism (BM) participation for units that contained both controllable and non-controllable assets. However, settlement and dispatch arrangements were never defined, and the Grid Code stipulates that QPN values must be zero. ELEXON is introducing new solutions for sites with controllable and uncontrollable loads through BSC Modification P375 – 'Behind the Meter' arrangements.

#### Joint BM Units

Joint BM Units were introduced as part of NETA to allow customers with Non-Half Hourly (NHH) Teleswitch meters to participate in the BM. In reality they were never fully implemented; the requirements for dispatching Joint BM Units were never agreed and, after discussions with National Grid ESO, no evidence has been found of such dispatch processes being developed or implemented. Joint BM Units can be registered with the Central Registration Agent (CRA), but this functionality has never been used.

## 5 Code Specific Matters

#### **Technical Skillsets**

An understanding of the structure of the relevant sections of Grid Code.

#### **Reference Documents**

The <u>Balancing and Settlement Code</u> (BSC), as BSC modification P394 is the basis for this modification proposal.

## 6 Proposer's Solution

This modification will update the Grid Code with the changes outlined in Section 11 "Legal Text".

## 7 Impacts & Other Considerations

This modification is being raised alongside and in response to BSC modification proposal P394; the content of each proposal will directly impact in part on the other.

There are no wider impacts beyond the BSC and the Grid Code.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This modification does not impact on a current SCR.

### **Consumer Impacts**

No consumer impacts are expected from this modification.

## 8 Relevant Objectives

Impact of the modification on the Applicable 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
(b) 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
(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

(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	Neutral	
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive	

### 9 Implementation

We recommend that this modification is implemented as soon as possible after a decision on this modification has been made.

### 10 Code Administrator Consultation: How to repond

If you wish to respond to this Code Administrator Consultation, please use the response pro-forma which can be found under the 'Industry Consultation' tab via the following link;

https://www.nationalgrideso.com/codes/grid-code/modifications/gc0135-removal-redundant-provisions

Responses are invited to the following questions;

- 1. Do you believe GC0135 better facilitates the Applicable Grid Code Objectives? Please include your reasoning.
- 2. Do you support the proposed implementation approach?
- 3. Do you have any other comments in relation to GC0135?

Views are invited on the proposals outlined in this consultation, which should be received by 5pm on 21 January 2020. Please email your formal response to: <a href="mailto:qrid.code@nationalgrideso.com">qrid.code@nationalgrideso.com</a>

If you wish to submit a confidential response, please note the following;

Information provided in response to this consultation will be published on National Grid ESO's website unless the response is clearly marked 'Private & Confidential', we will contact you to establish the extent of this confidentiality. A response marked 'Private & Confidential' will be disclosed to the Authority in full by, unless agreed otherwise, will not be shared with the Grid Code Modifications Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

Please note an automatic confidentiality disclaimer generated by your IT System will not in itself, mean that your response is treated as if it had been marked 'Private & Confidential.

# 11 Legal Text

## **Text Commentary**

The proposed changes remove the references to **Quiescent Physical Notifications** and **Joint BM Units** (including entries for "QPN" and "QPNs"). Where necessary, syntax, punctuation and grammar has then been considered and amended as necessary to ensure continuity and structural clarity.

This modification will update the Grid Code with the changes outlined in the following table:

Section	Defect		
Glossary & Definitions	Glossary & Definitions		
Emergency Instruction	Change to remove "QPN" and now reads:		
	"An instruction issued by <b>The Company</b> in emergency circumstances, pursuant to BC2.9, to the <b>Control Point</b> of a <b>User</b> . In the case of such instructions applicable to a <b>BM Unit</b> , it may require an action or response which is outside the <b>Dynamic Parameters</b> , <b>QPN</b> or <b>Other Relevant Data</b> , and may include an instruction to trip a <b>Genset</b> ."		
Joint BM Unit Data	Remove entire reference as follows "Joint BM Unit  Data Has the meaning set out in the BSC."		
Quiescent Physical Notification or	Remove entire reference as follows:		
QPN	"Quiescent Physical Notification or QPN		
	Data that describes the MW levels to be deducted from the Physical Notification of a BM Unit to determine a resultant operating level to which the Dynamic Parameters associated with that BM Unit apply, and the associated times for such MW levels. The MW level of the QPN must always be set to zero."		
Introduction			
OC5.1(b)(ii)	Change to read "tests on <b>BM Units</b> , to ensure that the <b>BM Units</b> are available in accordance with their submitted <b>Export and Import Limits</b> , <b>QPNs</b> , <b>Joint BM Unit Data</b> and <b>Dynamic Parameters</b> ."		
Objective			
OC5.2(c)	Change to read "whether each <b>BM Unit</b> is available as declared in accordance with its submitted <b>Export and Import Limits</b> , <b>QPN</b> , <b>Joint BM Unit Data</b> and <b>Dynamic Parameters</b> ; and"		

Procedure for Testing – The Company's Instruction for Testing		
OC5.5.1.2(a)	Mechai accorda Limits, Parame	e to read "if active in the <b>Balancing</b> nism, meets the ability to operate in ance with its submitted <b>Export and Import</b> QPN, Joint BM Unit Data and Dynamic eters and achieve its expected input or output as been monitored under OC5.4; and"
OC5.5.1.3(c)	be initial accomp (in accomp (in accomp which hest was accorded OC5.5.*	e to read "The test referred to in OC5.5.1.1 will sted by the issue of instructions, which may be panied by a <b>Bid-Offer Acceptance</b> , under <b>BC2</b> ordance with the <b>Export and Import Limits</b> , coint BM Unit Data and Dynamic Parameters ave been submitted for the day on which the is called, or in the case of a <b>CCGT Unit</b> , in ance with the parameters submitted under 1.3(b)). The instructions in respect of a <b>CCGT</b> thin a <b>CCGT Module</b> will be in respect of the <b>Unit</b> , as provided in BC2."
Procedure for Testing – Test and M "Parameter to be Tested"]	onitoring	g Assessment [Table entries listed under
Export and Import Limits, QPN, Joi Unit Data and Dynamic Parameters		Change to read: Export and Import Limits,  QPN, Joint BM Unit Data and Dynamic  Parameters
The Export and Import Limits, QPN BM Unit Data and Dynamic Parameter under test are within 2½% of the declaration value being tested.	ters	Change to read "The Export and Import Limits, QPN, Joint BM Unit Data and Dynamic Parameters under test are within 2½% of the declared value being tested."
Dispute Resolution		
OC5.6.2		Change to read "If a BM Unit fails the test, the User shall submit revised Export and Import Limits, QPN, Joint BM Unit Data and/or Dynamic Parameters, or in the case of a BM Unit comprising a Generating Unit, Power Generating Module, CCGT Module, HVDC Equipment, DC Converter, OTSUA (prior to the OTSUA Transfer Time) or Power Park Module, the User may amend, with The Company's approval, the relevant registered parameters of that Generating Unit, Power Generating Module, CCGT Module, HVDC Equipment, DC Converter, OTSUA (prior to the OTSUA Transfer Time) or Power Park Module, as the case may be, relating to the criteria, for the period of time until the BM Unit can achieve the parameters previously registered, as demonstrated in a re-test."

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Balancing Code No. 1 – Pre Gate Closure Process - Contents	
BC1.A.1.2	Change to read "Not Used. Quiescent Physical Notifications (QPN)"
Day Ahead Submissions	
BC1.4.2(b)	Change to read "(b) Not Used. Quiescent Physical Notifications—Each BM Participant may, in respect of each of its BM Units, submit to The Company for each Settlement Period of the next following Operational Day the data listed in BC1 Appendix 1 under the heading of "Quiescent Physical Notifications" to amend the data already held by The Company in relation to Quiescent Physical Notifications, which would otherwise apply for those Settlement Periods"
BC1.4.2(e)	Para.2, change to read "These Dynamic Parameters shall reasonably reflect the expected true operating characteristics of the BM Unit and shall be prepared in accordance with Good Industry Practice. In any case where non-zero QPN data has been provided in accordance with BC1.4.2(b), the Dynamic Parameters will apply to the element being offered for control only, i.e. to the component of the Physical Notification between the QPN and the full level of the Physical Notification."
BC1.4.2(g)	Remove entire entry "(g) Joint BM Unit Data BM Participants may submit Joint BM Unit Data in accordance with the provisions of the BSC. For the purposes of the Grid Code, such data shall be treated as data submitted under BC1."
Receipt Of BM Unit Data Prior To Gate Clos	ure
BC1.4.4	Para.2, change to read "For the avoidance of doubt, no changes to the Physical Notification, QPN data or Bid-Offer Data for any Settlement Period may be submitted to The Company after Gate Closure for that Settlement Period."
BC1.4.5	Para.1, change to read "In the event that no submission of any or all of the BM Unit Data and Generating Unit Data in accordance with BC1.4.2 in respect of an Operational Day, is received by The Company by 11:00 hours on the day before that Operational Day, The Company will apply the Data Validation, Consistency and Defaulting Rules, with the default rules applicable to Physical Notifications, Quiescent Physical

	Notifications and Export and Import Limits data selected as follows:"
Appendix 1 – BM Unit Data	
BC1.A.1.2	Change to remove QPN but needs "not used" added to avoid significant renumbering issues will read "Not Used Quiescent Physical Notifications (QPN)
	For each BM Unit (optional) A series of MW figures and associated times, which describe the MW levels to be deducted from the Physical Notification of a BM Unit to determine a resultant operating level to which the Dynamic Parameters associated with that BM Unit apply.
	-An example of the format of data is shown below.
	Data Name BMU name Time From From level (MW) Time To -To level (MW) QPN , TAGENT , BMUNIT04 , 2001-11-03 06:30 , -200 , 2001-11-03 07:00 , -220 QPN , TAGENT , BMUNIT04 , 2001-11-03 07:00 , -220 , 2001-11-03 07:18 , -245 QPN , TAGENT , BMUNIT04 , 2001-11-03 07:18 , -245 , 2001-11-03 07:30 , -300
	A linear interpolation will be assumed between the QPN From and To levels specified for the BM Unit by the BM Participant. "
Balancing Code No.2 – Post Gate Closure F	Process (Contents)
BC2.8.2	Change to read "Consistency With Export And Import Limits, Qpns And Dynamic Parameters"
Information Used	
BC2.4.1(d)(b)	Change to read "Export and Import Limits, QPNs, and Joint BM Unit Data in respect of that BM Unit and/or Generating Unit supplied under BC1 (and any revisions under BC1 and BC2 to the data); and"
Revisions to BM Unit Data	
BC2.5.3	Change to read "Following Gate Closure for any Settlement Period, no changes to the Physical Notification, to the QPN data or to Bid-Offer Data for that Settlement Period may be submitted to The Company."

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Bid-Offer Acceptances	
BC2.7.1	Change to read "Bid-Offer Acceptances may be issued to the Control Point at any time following Gate Closure. Any Bid-Offer Acceptance will be consistent with the Dynamic Parameters, QPNs, and Export and Import Limits, and Joint BM Unit Data of the BM Unit, in so far as the Balancing Mechanism timescales will allow (see BC2.7.2)."
BC2.7.1(b)	Change to read "Bid-Offer Acceptances sent to the Control Point will specify the data necessary to define a MW profile to be provided (ramp rate break-points are not normally explicitly sent to the Control Point) and to be achieved consistent with the respective BM Unit's Export and Import Limits, QPNs and Joint BM Unit Data provided or modified under BC1 or BC2, and Dynamic Parameters given under BC2.5.3 or, if agreed with the relevant User, such rate within those Dynamic Parameters as is specified by The Company in the Bid-Offer Acceptances."
BC2.7.2	Change title to read "Consistency With Export And Import Limits, QPNs And Dynamic Parameters"
BC2.7.2(a)	Change to read "Bid-Offer Acceptances will be consistent with the Export and Import Limits, QPNs, and Joint BM Unit Data provided or modified under BC1 or BC2 and the Dynamic Parameters provided or modified under BC2. Bid-Offer Acceptances may also recognise Other Relevant Data provided or modified under BC1 or BC2"
BC2.7.2(b)	Change to read "In the case of consistency with Dynamic Parameters this will be limited to the time until the end of the Settlement Period for which Gate Closure has most recently occurred. If The Company intends to issue a Bid-Offer Acceptance covering a period after the end of the Settlement Period for which Gate Closure has most recently occurred, based upon the then submitted Dynamic Parameters, QPN's, Export and Import Limits, and Bid-Offer Data and Joint BM Unit Data applicable to that period, The Company will indicate this to the BM Participant at the Control Point for the BM Unit." [Retain remainder of paragraph as-is]
BC2.7.3(b)	Change to read "because they are not consistent with the Export and Import Limits, QPNs, or Dynamic Parameters or

	Joint BM Unit Data applicable at the time of issue of the Bid-Offer Acceptance."
Ancillary Services	issue of the bid-offer Acceptance.
BC2.8.2 [Title]	Change title to read "Consistency With Export And Import Limits, QPNs and Dynamic Parameters"
BC2.8.2	Change to read "Ancillary Service instructions will be consistent with the Export and Import Limits, QPNs, and Joint BM Unit Data provided or modified under BC1 or BC2 and the Dynamic Parameters provided or modified under BC2. Ancillary Service instructions may also recognise Other Relevant Data provided or modified under BC1 or BC2."
BC2.8.3(a)	Change to read "Ancillary Service instructions may only be rejected, by automatic logging device or by telephone, on safety grounds (relating to personnel or plant) or because they are not consistent with the applicable Export and Import Limits, QPNs, Dynamic Parameters, Joint BM Unit Data, Other Relevant Data or data contained in the Ancillary Services Agreement and a reason must be given immediately for non-acceptance."
<b>Emergency Circumstances</b>	
BC2.9.3.1	Change to read "In the case of BM Units and Generating Units in Great Britain, Emergency Instructions will be issued by The Company direct to the User at the Control Point for the BM Unit or Generating Unit and may require an action or response which is outside its Other Relevant Data, QPNs, or Export and Import Limits submitted under BC1, or revised under BC1 or BC2, or Dynamic Parameters submitted or revised under BC2."  Change to read "In the case of a BM Unit or a Generating Unit, Emergency Instructions may include an instruction for the BM Unit or the Generating Unit to operate in a way that is not consistent with the Dynamic
	Parameters, QPNs and/or Export and Import Limits."
Data Registration Code	
Schedule 8	Revise table as shown below
	LIED BY BM PARTICIPANTS 1 OF 1

CODE	DECODIDATION
CODE	DESCRIPTION
BC1	Physical Notifications
BC1	Quiescent Physical Notifications
BC1 & BC2	Export and Import Limits
DOT & DOZ	Export and import clinits
BC1	Bid-Offer Data
BC1	Dynamic Parameters (Day Ahead)
BC2	Dynamic Parameters (For use in Balancing Mechanism)
BC1 & BC2	Other Relevant Data
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BC1	Joint BM Unit Data

<sup>-</sup> No information collated under this Schedule will be transferred to the Relevant Transmission Licensee

# 12 Annex 1: Self Governance Statement