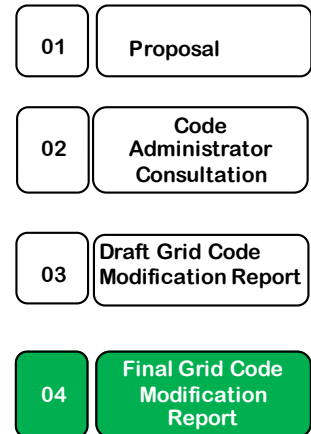




GC0136








Non-material changes to the Grid Code following implementation of the EU Connection Codes.



Purpose of Modification: To implement a number of non-material amendments to various sections of the Grid Code, to correct errors which were identified following the implementation of previous Grid Code Modifications GC0100, GC0101, GC0102 and GC0104. Those Modifications were introduced following the implementation of the European Connection Network Code (i.e. Requirements for Generators (RfG), HVDC and Demand Connection (DCC) codes).

 This Final Self Governance Grid Code Modification Report has been prepared in accordance with the terms of the Grid Code. An electronic version of this document and all other GC0136 related documentation can be found on the ESO website via the following link:
<https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0136-non-material-changes-grid-code>
 The purpose of this document is to assist the Panel in making its recommendation on whether to implement GC0136 into the Grid Code.

 **Low Impact** All users – correction to errors in Grid Code and provides clarification.

Contents		 Any questions?
1	About this document	3
2	Original Proposal	4
3	Proposer's Solution	5
4	Relevant Objectives	6
5	Implementation	6
6	Legal Text	8
7	Code Administrator Consultation: how to respond	6
	Annex 1: GC0136 Legal Text	13
	Annex 2: Table of changes: Issues identified with new baseline	13
	Annex 3: List of queries discussed with Group	13
	Annex 4: Self Governance Statement GC0136	13
	Annex 5: First Code Administrator Consultation Response	9
	Annex 6: Second Code Administrator Consultation Response	9
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Timetable

The Code Administrator recommends the following timetable:	
Changes approved at Panel	29 October 2020
Code Administrator Consultation period (1 Month)	19 November 2020 – 21 December 2020
Draft Self Governance Report issued to the Grid Code Review Panel	15 January 2021
Draft Self Governance Report presented to the Grid Code Review Panel	25 January 2021
Grid Code Review Panel decision	25 January 2021
Issue to Panel to confirm votes held at Panel (5 working days)	28 January 2021 – 04 February 2021
Appeal window (15 working days)	05 February 2021 – 26 February 2021
Decision implemented in Grid Code	05 March 2021

1 About this document

This document is the Final Grid Code Self Governance Modification Report that contains the details of the proposed corrections to the Grid Code with the of improving the quality of the text for all stakeholders.

GC0136 was proposed by National Grid ESO and was submitted to the Grid Code Review Panel for its consideration on 19 December 2019. The Panel decided that the Proposal met the criteria for Self-Governance as the changes were non-material.

The Self-Governance criteria used by the Panel to make the decision were as follows:-

Self-Governance - The modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- i) Existing or future electricity customers;*
- ii) Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity*
- iii) The operation of the National Electricity Transmission System*
- iv) Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies*
- v) The Grid Code's governance procedures or the Grid Code's modification procedures*

However, the Panel on 19 December 2019 could not determine whether or not this should proceed straight to Code Administrator Consultation.

Specifically, the Panel requested that:

- the non-material changes should be clearly identified and should be separated from the typographical changes. The Proposer has provided two documents which can be found in Annex 2 and Annex 3 which detail all the changes; and the proposed changes to the legal text need to be reviewed by a group of stakeholders and industry experts.

Following completion of both of these tasks, Panel on 26 March 2020 agreed that GC0136 should proceed to Code Administrator Consultation.

After the first Code Administrator Consultation had closed on 13 May 2020, the modification progressed to Implementation. However, the Code Administrator encountered issues with the conversion of the legal text from word to PDF.

The implementation was halted and the issue was presented to Panel for a decision. The Panel decided that it needed to be rebaselined and sent back out for a further Code Administrator Consultation, which was held from 19 November 2020 and closed at on 21 December 2021.

This Final Self Governance Modification Report was considered by Grid Grid Code Review Panel on 25 January 2021 and a determination vote was carried out.

2 Code Administrator Consultation Responses

One response was received to the First Code Administrator Consultation, with one response received to the Second Code Administrator Consultation.

A summary of those responses can be found in Section 10 of this report. The respondents to both consultations agreed that the proposal better facilitates the applicable Grid Code objectives.

This Final Self Governance Grid Code Modification Report has been prepared in accordance with the terms of the Grid Code. An electronic copy can be found on the National Grid ESO website <https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0136-non-material-changes-grid-code> along with the Modification proposal form.

3 Original Proposal

Section 2 (Original Proposal) is sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported.

Defect

In 2018, the GB Grid Code was updated (through Grid Code modifications GC0100, GC0101, GC0102 and GC0104) to implement the European Connection Network Codes (ie Requirements for Generators (RfG), HVDC Code and the Demand Connection Code (DCC))

Shortly after the requirements of RfG and HVDC Codes were implemented into the GB Grid Code, it was realised that the effective date from when the RfG and HVDC Codes applied was incorrect, together with a number of other minor errors. It was initially proposed to address all these issues at the same time, however the implementation dates were first corrected via Grid Code modification GC0116 and the later non-material changes were agreed to be amended at some future point which has resulted in this Grid Code Modification (GC0136).

As part of this modification, the opportunity is being taken to correct a number of other outstanding errors which have been observed in checking the current Grid Code legal text.

What

This modification seeks to correct these errors in the relevant sections of the Grid Code.

Why

This will provide clarity to users, remove known errors and improve the quality of the Grid Code.

How

It is proposed to modify the Grid Code to correct the identified errors. Please see the Legal Text Section for a summary of the proposed changes, and the attached Legal Text for those sections in full detail.

4 Proposer's Solution

Section 3 (Proposer's Solution) is sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported.

Correcting the typographical and other non-material errors will address the defect.

Please see a high-level summary of the changes in Annex 2 and updates to the Legal Text in Annex 1 of this consultation.

After the first Code Administrator Consultation had closed on 13 May 2020, the modification progressed to Implementation. However, the Code Administrator encountered issues with the conversion of the legal text from word to PDF. The implementation was halted and the issue was presented to Panel for a decision. The Panel decided that it needed to be re-baselined on the most recent version of the Grid Code.

5 Impacts & Other Considerations

Shortly after the requirements of RfG and HVDC Codes were implemented into the GB Grid Code, it was realised that the effective date from when the RfG and HVDC Codes applied was incorrect, together with a number of other minor errors. It was initially proposed to address all these issues at the same time, however the implementation dates were first corrected via Grid Code modification GC0116 and the later non-material changes were agreed to be amended at some future point which has resulted in this Grid Code Modification (GC0136).

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

This modification is not expected to impact any SCR's or other significant industry change projects or other Consumers directly.

Consumer Impacts

This modification is not expected to impact Consumers directly.

6 Relevant Objectives

This section outlines the Proposer's view of how this modification meets the Applicable Grid Code 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	Positive
(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);	Positive
(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;	Positive
(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
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive

This modification makes a number of changes across multiple areas of the Grid Code. Whilst the individual changes are not material, together they will make a significant improvement to the grid code, by removing errors, improving accuracy and making the text clearer and easier to understand for users. This has a positive impact on all the Grid Code objectives.

7 Implementation

GC0136 makes changes throughout the Grid Code but it is essential to the intent of this modification that none of these are material. The Panel's decision on Self-Governance was made on this basis.

8 First Code Administrator Consultation Response Summary

The Code Administrator Consultation was issued on 21 April 2020 for 15 working days with a closing date of 13 May 2020.

One response was received (National Grid ESO) in response to the Code Administrator Consultation and this can be found in Annex 5 of this report.

The response received was from National Grid ESO.

On whether or not the Original best met the Grid Objectives:

The respondent agreed that GC0136 better facilitates all five applicable Grid Code Objectives by removing errors, improving accuracy and making the text clearer and easier to understand for Users. Whilst none of the individual changes are material, there are numerous non-material changes being proposed, and together they will make a significant improvement to the accuracy and clarity of the Grid Code as a whole.

On Implementation:

The respondent recommend that this is implemented sooner rather than later. It impacts many areas of the Grid Code, so it is advisable to implement these changes as soon as possible, to avoid any unnecessary confusion between different versions of the code.

Since they are so widespread, care will need to be taken in implementing these changes. Panel should ask the Code Administrator to ensure that the changes are made to the baseline at the time that the mod is approved and thereafter that care is also taken to apply the changes from any modification that is in progress to the baseline as corrected through GC0136.

9 Second Code Administrator Consultation Response Summary

A second Code Administrator Consultation was required to issues highlighted within the legal text at DFMR stage. The issues highlighted were as follows:

After the first Code Administrator Consultation had closed on 13 May 2020, the modification progressed to Implementation. However, the Code Administrator encountered issues with the conversion of the legal text from word to PDF.

The implementation was halted, and the issue was presented to Panel for a decision. The Panel decided that it needed to be rebaselined and sent back out for a further Code Administrator Consultation, which was held from 19 November 2020 and closed at on 21 December 2021.

One response was received to the Second Code Administrator Consultation from SSE Generation Plc. This can be found in Annex 6 of this report.

On whether or not the Original best met the Grid Objectives:

The respondent agreed that GC0136 better facilitates one of Grid Code Objectives in regards to efficiency in regards to Grid Code Arrangements (e), whilst being neutral against objectives (a), (b), (c) and (d).

Implementation

The respondent agreed with the proposed implementation outlined in the Second Code Administrator Consultation.

Further Comments

SSE Generation Plc. highlighted that their support for this proposal is entirely predicated on the ESO's statement (as the Proposer) that all the changes within the proposal are non-material as per the Grid Code definition of 'material effect'.

SSE did however make the caveat that if the proposed changes set out within GC0136 are greater than £10k per party then they would not support this change as it would have been raised erroneously as it would not comply with the 'self-governance' criteria.

10 Legal Text

The proposed legal text for GC0136 is set out in Annex 1 of this document.

The Panel decided that it needed to be rebaselined on the most recent version of the Grid Code.

11 Panel Views

At the Grid Code Review Panel meeting on 25 January 2021, the Panel voted on GC0136 against the Applicable Grid Code Objectives. The Panel members unanimously agreed that the Original was better than the baseline and determined that it should be implemented.

For reference the Applicable Grid Code Objectives are:

(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity

- (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);*
- (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;*
- (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*
- (e) *To promote efficiency in the implementation and administration of the Grid Code arrangements.*

Vote 1: Does the Original facilitate the objectives better than the Baseline

Panel Member: **Alan Creighton**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	No	No	No	No	Yes	Yes
Voting Statement						
This modification corrects several non-material issues and errors in the Grid Code which will clarify the application of the Grid Code for users.						

Panel Member: **Alastair Frew**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Neutral	Yes
Voting Statement						
This is a housing keeping modification which does not change any requirements or obligations on any party and it only tidying up the text.						

Panel Member: **Christopher Smith**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes
	Voting Statement					
The minor modifications help reduce potential confusion in the codes.						

Panel Member: **Guy Nicholson (Not present for the Vote)**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	n/a	n/a	n/a	n/a	n/a	n/a
	Voting Statement					

Panel Member: **John Harrower**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Yes	Yes	Yes
	Voting Statement					
The changes proposed in the Modification remove typographical errors and other minor wording errors within the Grid Code improving readability.						

Panel Member: **Rob Wilson**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
	Voting Statement					
These changes while minor help maintain the accuracy and clarity of the Grid Code and should be made.						

Panel Member: **Robert Longden**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
Voting Statement						
In correcting a number of minor errors the modification is positive and should be made.						

Panel Member: **Roddy Wilson**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
Voting Statement						
The modification, consisting of limited changes across multiple parts of the GC, is supported on the grounds that they improve the GC by correcting errors and improve the accuracy and clarity for users.						

Panel Member: **Sigrid Bolik**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Yes	Yes	Yes	Yes
Voting Statement						
The deficiencies have been defined, discussed and evaluated and open queries addressed within additional meetings. I support the corrections.						

Panel Member: **Graeme Vincent – Alternate for Steve Cox**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Neutral	Neutral	Neutral	Neutral	Yes	Yes

Voting Statement	
The proposed modifications correct a number of non-material errors and improve accuracy of the legal text within the Grid Code and therefore should improve understanding of requirements by Users.	

Vote 2 – Which option is the best?

Panel Member	BEST Option?
Alan Creighton	Original
Alastair Frew	Original
Christopher Smith	Original
John Harrower	Original
Guy Nicholson	Not present for vote
Rob Wilson	Original
Robert Longden	Original
Roddy Wilson	Original
Sigrid Bolik	Original
Graeme Vincent (Alternate to Steve Cox)	Original

Annex 1: GC0136 Legal Text

The proposed legal text for GC0136 can be found on the National Grid ESO website [here](#).

The Panel decided that it needed to be rebaselined on the most recent version of the Grid Code.

Annex 2: Table of changes: Issues identified with new baseline

This document lists the non-material amendments proposed as a result of conducting a thorough review of the baseline in relation to the implementation of respective modifications.

Annex 3: List of queries discussed with Group

This document details the queries and Proposer's responses on the GC0136 proposed legal text which were discussed with the group of stakeholders involved in this modification.

Annex 4: Self Governance Statement GC0136

This is the Self-Governance statement issued to Ofgem.

Annex 5: First Code Administrator Consultation Responses

This contains the response from the first Code Administrator Consultation.

Annex 6: Second Code Administrator Consultation Responses

This contains the response from the second Code Administrator Consultation.