

Workgroup Consultation Response Proforma

GC0109: Publication of the various GB electricity Warnings or Notices or Alerts or Declarations or Instructions or Directions etc. (“System Warning Alerts”) issued by or to the Network Operator(s).

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to grid.code@nationalgrideso.com by **5pm on 16 December 2020**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

If you have any queries on the content of this consultation, please contact Paul Mullen at paul.j.mullen@nationalgrideso.com or grid.code@nationalgrideso.com

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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*

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Please express your views regarding the Workgroup Consultation in the right-hand side of the table below, including your rationale.

Standard Workgroup Consultation questions	
1	<p>Do you believe that the GC0109 Original solution better facilitates the Applicable Objectives?</p>

No. Objective D’s justification states in part:

“Without full visibility of this information some market participants will be placed at a disadvantageous position compared to others” but no evidentiary examples are given. We would suggest use of the word “will” would more appropriately replaced by “may”. The same logic applies in response to Objective B.

We agree the mod increases transparency but are concerned with the stated outcomes, value, and impact relating to these new alerts. We note Ofgem’s comments in the GC0133 send back:

“...the evidence provided on the benefits of the code modification to market participants and stakeholders is incomplete, as it does not describe the underlying evidence on the benefits and/or costs of the modification. For example, while the proposal refers to the modification “improving wider industry communications,” it does not demonstrate or provide evidence on how the modification would lead to those end benefits.”

Objective E relates to “...efficiency in the implementation and administration of the Grid Code arrangements”. Given the nature of some of these alerts it cannot be stated that the Original promotes efficiency as-is; the addition of new alerts and therefore processes and diversion of resource within the control centre would more-likely erode operational efficiency.

		<p>Regarding single-location publication, we acknowledge is more efficient than via multiple routes, but conversely could be viewed as less transparent than including/duplicating alerts on secondary channels to ensure a wider reach - e.g. Twitter is more accessible to household consumers who may take an active interest.</p> <p>We also do not feel that there is a need to specify the platform for publication at all; it is accepted practise that the ESO uses BMRS as a priority for publication (except Capacity Market notifications as below), and specifying it within the Grid Code makes it less future-proof e.g. if systems changes occur.</p>
2	Do you support the proposed implementation approach?	<p>No. 10 working days would not necessarily provide sufficient time for the ENCC to update its processes and create new templates for submitting the new warnings to BMRS. We would propose 30 days from the point of approval.</p>
3	Do you have any other comments?	<p>We support the principle of GC0109 but have concerns regarding the value and potential impact(s) associated with the Original, which are further unpacked within the answers to questions 5-8.</p> <p>Increasing transparency of industry communications and ensuring a level commercial playing field nationally are fundamental aspects of our ambitions. However, this should incorporate wider consideration of value, and associated costs and impacts of specific alerts.</p> <p>Half of the proposed alerts are already published and so we support their inclusion. However the Original solution contains some System Warning Alerts for which the benefits</p>

of mandatory publication are not clear, and one which is entirely non-viable due to volume of issue. While the Proposer's view that increasing transparency of industry communications represents sufficient justification of value, again we note GC0133 send back. While the related Terms of Reference entry requires only that the workgroup "consider points made..." within the GC0133 send back decision, we feel appropriate scrutiny has not been applied to the specific alerts proposed within GC0109.

The ESO requested to include the following question in the consultation in relation to the GC0133 send back, but the work group deemed it unnecessary:

"Can you provide any examples of emergency instructions or alerts that are not currently shared publicly, explaining why doing so could facilitate cost savings to consumers?"

This leaves a hole in the evidence that the consultation gathers and increases risk of the points Ofgem raised in their 133 send back not being addressed due to insufficient evidence to quantify benefits.

We also have concerns over the specificity of BMRS as the source of publication, which we outline further below.

Additionally we note that the supplied legal text does not reflect the agreed position of 20 minute turnaround for alerts received by the ESO; this is purely an omission and should be corrected.

4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	Yes, as while transparency is inarguable, we feel the solution needs to focus more on the items which can potentially add value without heavy administrative burdens.
Modification Specific Workgroup Consultation questions		
5	The Workgroup have set out four categories for the proposed items to be classified (or not) as System Warning Alerts and have noted that Category 1 System Warning Alerts are already published. The Workgroup have proposed that the System Warning Alerts in Categories 2 and 3 will need to be published and are within the scope of GC0109 whilst System Warning Alerts in Category 4 are outside the scope of GC0109. Do you agree with the Workgroup's list and do you think there is any System Warning Alerts that needs to be included or excluded from publication? Please provide the rationale for your response.	<p>Of those in category 2, only Distribution Code Emergency Action is not currently published by default by the ESO. GC0109 notes Distribution Operating Code 7.6 "Requirement to Notify Events" as the pertinent reference. This requires DNOs to notify Users when an Event occurs (on the DNO's system, or on receipt of notification of an event on the NETS) which the DNO believes might have had or will have had an "Operational Effect" on the System of a User. Similarly, Users must notify DNOs of an Event on the User's System of a User connected to the DNO's system which has had or may have an Operational Effect on the DNO's system or the NETS.</p> <p>The definition of an "Event" within the DOC is very broad, as are the examples given in DOC7.6.1.4 where these notifications may apply. We spoke with the ENCC and DSO control centre managers to discuss the implications of requiring all such event notifications to be published to BMRS.</p> <p>There was unanimous agreement that mandatory publication of all DOC7.6 notifications to BMRS would be overly burdensome. One example was that there can easily be 10 faults on an average day, plus pre-arranged events and other-such network alarms which would technically fall under DOC7.6. The group agreed that this logic could reasonably be applied across all DNOs which could</p>

	<p>equate to 51,000+ notifications per year.</p> <p>While affected Users are informed directly, the requirement to notify the ESO in order to facilitate publication on BMRS would be heavily burdensome to both DNOs and the ESO ENCC. They could not see any value in escalation beyond current methods of publication of outages (etc) on their websites.</p> <p>As such, this specific DCEA as per DOC7.6 is not seen as viable and will be removed in our alternatives.</p> <p>Of those in category 3:</p> <ul style="list-style-type: none">• Voltage Control Contracted with DNO: This is a fast-reserve service within the ESO's Platform for Ancillary Services ("PAS"), used for general balancing and dispatched in cost order. It is not an indication of an emergency condition/situation and publication would provide no value over and above notification of any other standard balancing action. Additionally, it is dispatched typically several times per day (1800+ times per year total) meaning publication would dilute the usefulness of BMRS, and would not meet the Grid Code objective "To promote efficiency in the implementation and administration of the Grid Code arrangements". As such, the ESO does not support the inclusion of this alert.• STC Emergency Instruction to TO: This would typically be issued to instruct a TO to recall
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a circuit currently undergoing a planned outage – for example, to relax a boundary constraint. BEIS requirements do not permit us to identify the circuit publicly, and so any publication would be limited to stating that we have recalled a circuit to relax a boundary constraint. While this means there are no direct commercial concerns, and the frequency of issue (approximately twice per month) does not represent a challenge, the ESO questions what value there is to the wider industry in publication of this alert.

- **ESEC Implementation:** This would be issued in a worst-case scenario situation and is therefore inherently of value in that context. However it should be noted that the legal text's inclusion of utilising "reasonable endeavours" to meet publication within 15mins highlights the fact that prioritisation of grid security/stability must and will take absolute priority during the type of system-critical situations which would lead to this notification.
- **EMR Capacity Market Warning:** Capacity Market Notices are already published by default, and communicated automatically by National Grid systems to the following website:
gbcmn.nationalgrid.co.uk
which also offers text and email alert subscription functionality. This operates separately to ENCC

operations. While we take no issue with the mandatory requirement to publish this alert, we note that BMRS would be in addition to the existing process rather than replacing it and therefore question if it is of value to require BMRS publication.

- **Interconnector Emergency Assistance Requests:** These alerts are essentially a commercial service which operate in close to real-time and are issued approximately 10 times per year; typically associated with RoCoF issues. The process is not automated, meaning an additional manual process during times when the system is likely to be under stress. There are no commercial concerns associated with publication, but we question what the value to wider industry markets could be. We also note that the consultation suggests these are not currently referenced in Grid Code, however we believe they are covered under BC2.9.6 “Emergency Assistance to and from External Systems”.
- **Demand Turn Up:** No-longer used and, as acknowledged within the proposal, it is not referenced in the Grid Code. As such, there is no value in its inclusion in GC0109.

We agree with the workgroup that those alerts highlighted in category 4 should remain out of scope.

6	<p>The Workgroup have considered 4 different BMRS Implementation Options and agree that Options 1 and 2 only are suitable for the scope of GC0109. Which of Option 1 or Option 2 do you prefer?. Please provide the rationale for your response.</p>	<p>We feel that mandating the use of BMRS specifically for publication of these alerts is unnecessary. Making the alerts (where outlined in our response to question 5) mandatory for publication is a key part of the original, but we see no value in specifying the platform; if for example BMRS was ever renamed or replaced by a new/better platform, this would necessitate administrative changes within affected systems/guidance, along with a further Grid Code modification to amend the references.</p> <p>The ESO envisages continuing to utilise BMRS (whichever option is agreed as most viable) however.</p> <p>Regarding option 1 and option 2, our preference would be option 2 as this is stated as not being contingent on any BSC changes due to using the existing REMIT platform. Option 1 would likely need a BSC change to obligate publication by ELEXON of the alerts received from the ESO.</p>
7	<p>The Proposer has suggested a time window of 15 minutes (on a reasonable endeavours basis) for the ESO to issue the System Warning Alert to ELEXON for publication on the BMRS; and a time window of 20 minutes (on a reasonable endeavours basis) from the ESO receiving the System Warning Alert to issue to ELEXON for publication on the BMRS. Do you agree that these time windows are suitable? Please provide the rationale for your response.</p>	<p>We agree that these time windows are suitable. Any System Warning Alerts (or similar) already issued and published are typically published well within these timeframes.</p> <p>We must emphasise that “reasonable endeavours” should remain in the legal text, as ENCC’s priority is to maintain system security and stability.</p> <p>Note also that the ESO commits to publication of alerts received from other parties within 20 minutes of them being received by the ESO. The ESO cannot publish what it does not receive, and so any delays or flaws in alerts (by structure or content, for example) and associated correspondence beyond our control</p>

		will not render the ESO liable for lack of publication - timely or otherwise.
8	<p>In the “What is the Impact of this Change” section, the Workgroup has set out the benefits and costs of this change. Do you agree with the Workgroup’s view and are there are additional benefits and/or costs to set out? Please provide the rationale for your response.</p>	<p>We do not feel that the benefits and costs have been quantified clearly enough. This is a clear expectation of Ofgem as referenced in their send back decision on GC0133.</p> <p>Warning-specific Benefits In order to accurately assess the impact, a summary of the potential benefit to stakeholders should be provided for each warning/alert where applicable.</p> <p>Commercial Sensitivity We feel there should be further consideration of whether any of the new information to be shared could be considered commercially sensitive – for example, Distribution Code Emergency Action. While this mod increases transparency, no discussion is included regarding whether this may conversely have negative impacts on direct recipients of alerts if published. This view was also held by the DNOs we consulted with.</p> <p>Frequency/Resource There is also no deeper discussion regarding the potential frequency of issue for each of the newly proposed alerts, and consequently how much time (and therefore consumer money) would be required to administer them. For example, “Voltage Control Contracted with DNOs” could be issued ~5 times in a typical day, meaning 1,825 additional alerts on BMRS per year. This would undoubtedly dilute the efficacy of BMRS as a source of information useful to the wider market both in volume, and in consideration of the nature of the alert. This does not</p>

	<p>meet the intended aims of the Proposer's solution.</p> <p>General Transparency While again we agree that increasing transparency is essential, we must reiterate that the value judgement made in the "Impact" section does not adequately or specifically clarify the costs or outline what the actual value of each of the new alerts is. The ESO's research concludes that some are inherently of no discernible value over the baseline position.</p> <p>System Options As noted, when publishing via BMRS option 2 would be preferred as this requires the least amount of changes over all e.g. ELEXON have stated that changes to the BSC are likely not required under this option. However again we feel there is no need to specify publication via BMRS and to do so makes the Code less futureproof.</p> <p>Ofgem's refusal of urgency for GC0109 stated "<i>We believe the ESO should explore whether there are ways to increase transparency around system warnings as soon as possible, potentially outside of the industry codes process if appropriate</i>" – demonstrating their openness to flexible solutions in this area.</p>
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