

Code Administrator 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 12 April 2021**. 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.j.mullen@nationalgrideso.com or grid.code@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Rob Wilson
Company name:	National Grid ESO
Email address:	Robert.wilson2@nationalgrideso.com
Phone number:	07799 656402

For reference the Applicable Grid Code Objectives are:

- To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- 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);*
- 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;*
- 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*
- To promote efficiency in the implementation and administration of the Grid Code arrangements*

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

Standard Code Administrator Consultation questions		
1	Do you believe that the GC0109 Original proposal or WAGCM1 better facilitates the Applicable Objectives?	<p>The ESO on balance supports the principle of GC0109 and feels that WAGCM1 marginally better facilitates the applicable objectives overall, however there are a number of aspects to this modification which we would like to highlight as briefly set out in our response below.</p> <p>While we agree that both the Original and WAGCM1 potentially meet objective (b) in enhancing the information available to industry members, the actual value of the additional information to be shared by the ESO, or what positive actions stakeholders can take from it, has not been specifically identified.</p> <p>We note that the original proposal when raised in February 2018 sought urgency on the basis that warnings were not being shared that could have a significant commercial impact on market participants. Ofgem's decision on urgency¹ as made in August 2018, however, in turning this down noted that these concerns were <i>'not substantiated with sufficient evidence or explanation of how failure to consider GC109 on an urgent basis would result in a significant commercial impact on market participants.'</i></p> <p>In our view development of the modification has not provided further clarification of this position. We would note that of the 14 warnings, alerts or other items of information identified by the workgroup 8 of these being the most impactful are already published by the ESO on the BMRS system. One of the remaining warnings (EMR Capacity Market Notice) is an automated warning issued through the ringfenced EMR website² and to which the ESO has no more access than is freely available to any industry participants while the remaining items are expected to be encountered only very occasionally.</p> <p>The original solution, while it does not add significantly to the workload of the ESO Control Room, in mandating the use of BMRS is negative</p>

¹ <https://www.nationalgrideso.com/document/165271/download>

² <https://www.emrdeliverybody.com/cm/home.aspx>

		<p>against objectives (d) and (e). In raising an alternative that is not system specific the ESO is not setting out any intention to use a system other than BMRS as at present for those warnings already published, however it is likely that at some point in the future systems will change or evolve as they always do. This would always be something that would be done in consultation with industry. Tying the ESO to a specific software package or platform is not necessary and builds obsolescence into the code and industry systems.</p>
2	Do you support the proposed implementation approach?	Yes.
3	Do you have any further comments?	<p>We would like to highlight in our response three further areas of concern:</p> <p>Sendback of GC0133</p> <p>During the development of this modification by an industry workgroup, the ESO raised concerns in relation to Ofgem's sendback of Grid Code modification 'GC0133: <i>Timely informing of the GB NETS System State condition</i>' in that GC0133 has similarities with GC0109 in also placing requirements on the ESO to share information with industry participants where the value of doing so has been difficult to identify. In their sendback letter³ Ofgem directed the Panel to revise the final modification report '<i>so that further analysis in respect of objectives (a) and (c) is included, setting out...the benefits of the modification to market participants and stakeholders</i>'. The ESO felt that adding this question specifically to the workgroup consultation for GC0109 would have been beneficial in reducing the risk of a further sendback of GC0109, however the Proposer refused to allow this question to be included. It has also not been possible to ask this question in the Code Administrator Consultation since this asks standard questions only.</p> <p>In seeking to obtain answers to a reasonable question but finding no way to do this an inadequacy of the Code Governance process is highlighted.</p>

³ <https://www.nationalgrideso.com/document/176001/download>

Timeline

We note that 3 years have elapsed since this proposal was originally raised. During the initial development of the proposal, the GC0109 workgroup met between July 2018 and October 2019 with most of their deliberations being concerned with identifying the precise warnings/alerts (etc) which the proposer wished to be included, and the potential value associated with publishing them. The workgroup experienced continual quoracy problems which slowed its progress and a further full 12 months of delay was experienced from October 2019 during which the Code Administrator was waiting for the Proposer to complete an action to review the draft workgroup consultation. This lack of interest from both industry and the Proposer seems to indicate less urgency than was at first ascribed to this proposal.

Quality of the original proposal

The early part of the workgroup development was concerned with agreeing a list of the system warnings to be considered, scrutinising to what extent any of these were already shared, and trying to identify their value. The proposal also saw some significant changes during the workgroup meetings that took place from late 2020. In further exploring the proposed warnings the workgroup identified that:

- One warning (Demand Turn Up) was for use of an obsolete service
- One (Distribution Code Emergency Actions) would have resulted in >50,000 additional alerts per annum
- One (DNO Voltage Control Actions) would have resulted in >1,800 additional alerts per annum

These three warnings were removed from the solution by the workgroup with the agreement of the Proposer.

The extent of this development work and the lack of actual urgency highlights the need for better quality proposals to be raised to make better use of industry time and, during a time of unprecedented levels of change when industry resources are at a premium, to allow the industry to focus on higher

		priorities. It also highlights the need for a more effective Code Manager role including the abilities to provide strategic guidance and to better consider priorities.
--	--	---