

Trisha McAuley OBE  
Independent Chair  
CUSC & Grid Code Panel

Gurpal Singh  
Ofgem  
**By email**

25 June 2021

Dear Gurpal

**Grid Code Review Panel Panel Request for Urgency and Recommended Timetable for GC0151 ‘Grid Code Compliance with Fault Ride Through (FRT) Requirements’.**

On 23 June 2021 SSE raised GC0151. The Proposer sent a request to the Grid Code Panel Secretary for the modification to be treated as urgent.

The Grid Code Review Panel ("the Panel") on 24 June 2021 considered GC0151 and the associated request for urgency. This letter sets out the views of the Panel on the request for urgent treatment and the procedure and timetable that the Panel recommends.

**Overview of GC0151**

The ESO’s Head of Networks wrote to stakeholders on 7<sup>th</sup> May 2021 about “Grid Code Compliance with Fault Ride Through Requirements”. In that letter it set out three actions and; in the Appendix to that letter; an interim process that the ESO was proposing be applied by them on Users and Network Operators.

The Fault Ride Through process was subsequently presented by the ESO at the May 2021 Panel meeting where concerns and queries were raised by Panel Members in relation to this process.

In the view of the Proposer, the ESO have, inadvertently, given rise to concerns, by stakeholders, that if they were to follow this uncodified ‘voluntary’ ESO interim process this would:

- 1) Be placing Users (and in particular Generators) in breach of a relevant **legal requirement**;
- 2) Have a significant **commercial impact** on Users and consumers;
- 3) Have a significant impact on the safety and **security of the electricity system**;
- 4) Apply an **unreasonable timing** obligation on some stakeholders;
- 5) Apply a **discriminatory process** to some stakeholders; and

- 6) Not ensure and **enhance transparency** of the Fault Ride Through situation in Great Britain.

Therefore, a codified process is required to ensure legal compliance and certainty whilst maintaining security of supply and minimising the significant commercial impact on stakeholders as well as providing a reasonably timed, non-discriminatory process and enhanced transparency for stakeholders.

All documentation for this modification can be located via the following link:  
<https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0151-grid-code-compliance-fault-ride>

### Proposer rationale for Urgency

The Proposer set out their rationale for Urgency within the proposal form, which is assessed against the urgency criteria set out by the Authority. The Proposer's justification for urgency is as follows:-

Ofgem's Urgency Criteria	Proposer's Justification
a) A significant commercial impact on parties, consumers or other stakeholder(s).	(a) A significant commercial impact on Users, Network Operators, Suppliers, other market participants and consumers or other stakeholder(s); and
b) A significant impact on the safety and security of the electricity and/or gas systems.	(b) A significant impact on the safety and security of the electricity system; and
c) A party to be in breach of any relevant legal requirements	(c) Users to be in breach of a relevant legal requirements (REMIT Article 5).

### Panel Consideration of the Request for Urgency

The Panel considered the request for Urgency with reference to Ofgem's Guidance on Code Modification Urgency Criteria. The majority view of the Panel is that **GC0151 does meet** these criteria and **SHOULD** be treated as an Urgent Grid Code Modification Proposal.

Panel members set out their rationale behind this decision:

The majority of the Panel Members (9 out of 10) recommended Urgency and voted that all three criteria set out by Ofgem in relation to Urgency were applicable. These Panel Members believed that the open letter on May 7<sup>th</sup> from the ESO and the inclusion of an interim process for managing system security

risk has created an issue for industry which needs to be addressed on an urgent basis.

One Panel Member did not recommend Urgency and believed that progressing it with a high priority instead is likely to obtain a similar result and may avoid putting other work and staff under undue pressure. He believed, GC0151 will require significant development and that the timetable was too ambitious. He also noted that addressing concerns about the contents of the ESO's letter to industry on Fault Ride Through could be done far more directly and that this would be more likely to achieve a timely result.

Panel noted that if Urgency is required, there would be;

- A Code Administrator Consultation period of less than one calendar month; and
- Less than 5 clear working days for the Panel to check that their votes had been recorded correctly in the Final Modification Report.

Under Grid Code GR23.4, we are now consulting the Authority as to whether this Modification is an Urgent Grid Code Modification Proposal.

### **Procedure and Timetable**

Having decided to **recommend Urgency** to Ofgem, the Panel discussed an appropriate timetable for GC0151.

The Panel agreed that GC0151 subject to Ofgem's decision on Urgency should follow the attached Code Administrator's proposed timetable (Appendix 1 **Urgent recommendation**). In Appendix 2 of this letter, the Code Administrator has also provided the timeline if this follows standard timescales with the assumption that Panel prioritise this high in the prioritisation stack and this is progressed without the need for Special Panels.

Please do not hesitate to contact me if you have any questions on this letter or the proposed process and timetable. I look forward to receiving your response

Yours sincerely



Trisha McAuley OBE  
Independent Chair of the CUSC and Grid Code Panel

## Appendix 1– Urgent Recommendation

Modification Stage	Date
Request for Urgency Received	23 June 2021
Panel consideration of Urgency	24 June 2021
Letter issued to Ofgem	25 June 2021 (by 12pm)
Ofgem decision on Urgency	02 July 2021 (by 5pm)
Workgroup Nominations (4 working days)	25 June 2021 (9am) to 5pm on 01 July 2021
Workgroup 1	02 July 2021
Workgroup 2	05 July 2021
Workgroup 3	19 July 2021
Workgroup Consultation (15 working days)	22 July 2021 to 5pm on 12 August 2021
Workgroup 4	19 August 2021
Workgroup 5	24 August 2021
Workgroup Report issued to Panel (3 working days)	01 September 2021
Workgroup Report presented to Panel	06 September 2021
Code Administrator Consultation (10 working days instead of 1 month)	09 September 2021 to 23 September 2021
Draft Final Modification Report issued to Panel and Industry	27 September 2021
Draft Final Modification Report presented to Panel / Panel Recommendation Vote	05 October 2021
Final Modification Report issued to Panel to check votes recorded correctly (1 working day instead of 5)	05 October 2021
Submit Final Modification Report to Authority	07 October 2021
Authority Decision	TBC (as soon as reasonably practicable).
Date of Implementation	One working day after Authority decision

## Appendix 2– Standard Timeline

Modification Stage	Date
Workgroup Nominations (15 working days)	24 June 2021 to 5pm on 14 July 2021
Workgroup 1	15 July 2021
Workgroup 2	03 August 2021
Workgroup 3	03 September 2021
Workgroup Consultation (15 working days)	13 September 2021 to 5pm on 04 October 2021
Workgroup 4	07 October 2021
Workgroup Report issued to Panel (5 working days)	19 October 2021
Workgroup Report presented to Panel	27 October 2021
Code Administrator Consultation (one calendar month)	02 November 2021 to 02 December 2021
Draft Final Modification Report issued to Panel and Industry	08 December 2021
Draft Final Modification Report presented to Panel / Panel Recommendation Vote	16 December 2021
Final Modification Report issued to Panel to check votes recorded correctly (5 working days)	17 December to 24 December 2021
Submit Final Modification Report to Authority	29 December 2021
Authority Decision	TBC
Date of Implementation	Within 10 working days from Authority Decision