

Digitalised Whole System Technical Code (WSTC) Meeting Minutes

Consultation 1 Stakeholder Engagement Session 3

Date: 20/10/2021 **Location:** MS Teams
Start: 10:00 **End:** 11:00

Participants

Attendee	Attend/Regrets	Attendee	Attend/Regrets
Grace March (GM) - Sembcorp	Attend	Nicola Barberis Negra (NBN) - Orsted	Attend
Paul Farmer (PF) - Shell Energy Retail	Attend	Laetitia Wamala (LW) - NGESO	Attend
Vicky Allen (VA) - NGESO	Attend	Frank Kasibante (FK) - NGESO	Attend

Minutes Recipients

Industry - Published on the WSTC website

Agenda

1. Introduction
2. Presentation of Slides & Discussion
3. How to provide feedback & Thanks

Discussion

The discussions held during the presentation are summarised below:

1. Introduction (Section 2)

GM: With regards to how this project overlaps with the Energy Codes Reform (ECR), code consolidation was a big topic after the 2019 consultation. The most recent consultation only mentioned it briefly. Have you discussed the prioritisation of this project with BEIS?

LW: We have had engagement with BEIS and Ofgem. They are aware of this project. We are looking at how this project will feed into the ECR. Ofgem have committed to providing a representative on the steering group to make sure that we are aligned. Ogem/BEIS are better placed to answer the question on prioritisation.

NBN: There are a lot of pages in the codes and digitalising sounds like a good idea.

2. Potential Solutions (Section 3.1 Whole System Consolidation or Alignment)

GM: Aligning the technical codes on key issues would be quite useful as then you don't have to have both documents in front of you to work out which one has the tighter requirement.

Developing an overarching code and having existing codes is of concern as it could lead to legal confusion as to which is the binding document. As the punishments for violating the code are hefty, you want legal certainty. Whenever you have multiple documents addressing the same thing there is room for confusion.

LW: Do you think having the single technical code is the way forward to avoid the confusion?

GM: It depends on how the single code is structured. For instance, you could still find yourself referring to multiple chapters at the same time. I'm not fully on board with the single code that covers everything because that gives you potentially a lot more to wade through to find the bit that you want. However, the preference is either alignment or a single code rather than anything in the middle.

3. Potential Solutions (3.2 Digitalisation)

GM: The cross-code signposting would be extremely useful especially when one is new to the codes and unsure of where things sit.

My concern with the AI driven platform is that even if it's not legally binding, it could still be viewed as misleading. It certainly shouldn't be legally binding because if the AI does get it wrong either through user error or poor programming that leaves the ESO and the code user in an awkward situation where there's been a misunderstanding of a legal document based on a middle man. It isn't clear who would be at fault there. If you go down the AI driven platform route, it will need to come with a 'for guidance only' caveat. That could be written into the AI.

LW: There seems to be serious concerns from industry with regards to the AI. It's certainly something that is worth taking away and discussing with our digitalisation team.

GM: It's worth bearing in mind that the codes are currently changing quite a lot. Thus, AI would need to be kept up to date with everything that is changing. It might mean there is an additional step that the code administrator has to do which could drive up costs.

NBN: I agree with GM. I think we need to be really careful with AI because unless there is a check on what it is used for, you can't just assume that whatever comes out of the platform is the absolute truth. For that reason, really, we risk creating the platform that requires a lot of work; the benefits of which are unclear.

4. Potential Solutions (3.4 Work that can progress independently of the ECR outcome)

NBN: The SQSS and the Grid Code (GC) serve different purposes. If you include the SQSS in the GC, you also need to include it in the STC because the SQSS derives how the transmission system should be designed. It's potentially more for the STC than the GC. The GC is more specifically for generators. I'm not sure there would be any benefit in the SQSS being included there.

LW: With regards to the SQSS being more closely linked to the STC. We've had a lot of feedback around the STC being consolidated with the GC and the Distribution Code (DC).

NBN: In the offshore wind industry, where we also have to design an offshore transmission system (in addition to the windfarm), there are a lot of duplications that we need to consider across the GC and STC. Due to this overlap, combining these documents would be beneficial to us.

However, the STC also covers the operation of onshore systems which implies that the GC would need to be extended significantly. As long as it doesn't complicate the code too much, it would be very useful.

5. Potential Solutions (3.5 Delivery of Solutions)

GM: The choices are a little limited as with the ECR outcome the ESO is tied to the codes that they administer. For instance, they can't address things like DCUSA. I'm wary of going down a full route in case the outcome of the ECR is that there should be one single document that covers everything. I would be careful about doing too much in case the work might not be as useful as we might have thought.

LW: For this consultation, we are only looking at the GC and the DC. In this section we are seeking views on whether any identified areas in the GC and the DC that need whole system alignment should be progressed now via the GCRP and DCRP or if they should be written as recommendations for delivery later as part of the ECR implementation.

GM: Given how much there is going on, my instinct is to say to wait. However, it depends on the discussions with BEIS and Ofgem regarding ECR timing as we can't wait forever.

LW: Does that also apply to code consolidation and digitalisation?

GM: I think digitalisation could be fairly straightforward if you take a simple approach to it so it wouldn't be a huge amount of effort and it might end up as a good learning experience for whatever comes out of the ECR. I would say go ahead with digitalisation but be wary of consolidation. Unless BEIS and Ofgem are giving industry signals that energy code consolidation is quite far down on their priority list.

6. Key Benefits (Section 4)

GM: I generally agree. For new entrant there's a lot of consulting with the connections team to try to work out how it all works. It would be useful to have the codes be more user-friendly. I'm a little cautious of the phrase user-friendly because these are technical engineering legally binding documents, so a plain English approach can only take you so far before you start creating uncertainty. User-friendly should probably be caveated to be more user-friendly in a technical sense rather than user-friendly for the layman.

FK: Some stakeholders have said that using plain English would help to avoid misinterpretation of the legal text.

GM: There will be clauses where plain English is more useful, but there will also be clauses where you need a defined technical term. I wouldn't expect the whole document to use a plain English approach.

NBN: I agree with GM. It depends on how its implemented. It can be user friendly if it's implemented properly.

7. Project Governance (Section 5.1 Decision Making)

GM: It would be good if the ESO could keep forums like TCMF and GCDF up to date with the progress of the project. The governance route itself is fine and should work.

NBN: Looks fine.

LW: Are there any other advisory groups or forums where you think we need to go to present this information in an effort to get more feedback from industry?

NBN: There is a Grid Strategy group that is part of Renewable UK. They normally look at this type of consultation. That could be relevant here.

GM: Are you speaking with representative bodies from outside but related to the industry? Like bodies that represent engineers who happen to work in the power sector rather than the electricity industry and their engineers. Likewise, some universities and research facilities may be able to input on this from an engineering point of view.

LW: I am a member of the IET, I have been trying to get in to do this presentation. Regarding universities, we have been in touch with Birmingham University and are expecting a consultation response from them. We would welcome your ideas on research groups.

8. Project Governance (Section 5.2 Proposed Terms of Reference – Steering Group)

GM: Question 20 <how the steering group makes decisions> ties in with what the goal of the project is i.e. if it is to make recommendations or to actually do it. If it's to make recommendations, then there is less of a need to make a decision. The steering group can write down both sides of the story and recommend it to BEIS/Ofgem without consensus.

If you're delivering the project, then you need to make decisions and thus there needs to be some kind of voting structure.

9. Project Governance (Section 5.3 Stakeholder Engagement)

No questions

10. Project Governance (Section 5.4 Schedule)

GM: There is a lot of change going on in the industry now, therefore there is need to be flexible on timescales.

NBN: No comment

11. How to Provide Feedback

No questions