Digitalised Whole System Technical Code (WSTC)

Independent Networks Association (INA)

Date:	27/10/2021	Location:	MS Teams
Start:	11:00	End:	12:00

Participants

Attendee	Attend/Regrets	Attendee	Attend/Regrets
Joseff Reed (JR) - Brevia	Attend	Jayson Whitaker (JW) - Energy Assets	Attend
Steve Mockford (SM) - GTC	Attend	William Cass (WC) - Last Mile UK	Attend
David Overman (DO) - GTC	Attend	Andrew Wilkinson (AW) - ESPUG	Attend
Saeed Ahmed (SA) - Energy Assets	Attend	David Swadling (DS) - Eclipse Power	Attend
Laetitia Wamala (LW) - NGESO	Attend		

Minutes Recipients

Industry - Published on the WSTC website

Agenda

1. Introductions
2. Presentation of WSTC Slides (Oct/Nov) & Discussion
3. Closing Remarks

Discussion

The discussions held during the presentation are summarised below:

1. Introductions

Introductions were done as recorded above.

JW - INA comprises all the Independent Distribution Network Operators (IDNOs) and Independent Gas Transporters (IGTs) all of whom were represented in the meeting.

2. Presentation of WSTC Slides (Oct/Nov) & Discussion

During LW's presentation of the WSTC slides (Oct/Nov), the discussions summarised below were held.

The full slide pack can be viewed here.

2.1. Introduction (Section 2)

DO raised the following concerns:

2.1.1. Pace of change is an area where I would like to see change as in the INA industry things come along and require quick reaction. I just worry that putting the Distribution Code (DC) content into a bigger pot will slow it down. We see that with the DNOs anyway. As soon as you put it into ENA, everyone's got a vested interest, and wants to move at their pace. I'm not sure that has been properly considered as all the parties that are involved are the ones that slow things down.

2.1.2. Potentially NGESO issues will take precedence over some of the lower voltage issues which might not seem so important.

2.1.3. We could lose the ability to move things quickly e.g. to address the electric vehicles' demand and earthing of charge points. I worry that we'll lose that ability to move quickly enough as NGESO activities require a lot of due diligence.

2.1.4. The Distribution Network Operators' (DNOs) pace is not quick enough. Having to try and drag NGESO along will be quite a challenge and a frustration.

2.1.5. We'd like to think that we're quicker than the DNOs and we get frustrated by the speed at which the DNOs move. Therefore, I am not sure if consolidation makes it quicker or better. Maybe the split between Grid Code (GC) and DC could come down to another voltage level.

LW responses:

2.1.6. With a lot more generation at distribution, the intention is to move quickly to enable market participation.

2.1.7. Your concern with pace of change could be addressed through Ofgem/BEIS' proposed governance changes.

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

2.2.1. **SM:** We recognise that there are differences in the technical codes. The alignment of the codes is quite important to us although we have concerns with the slow pace at which changes across transmission and distribution are implemented.

2.2.2. **SM:** I think that if we can align to some degree the technical codes and attain consistency across the DC and the GC, it would be great. However, we actually need to make sure that's 'fleet of foot' and that we take due note of the lower voltages. The fear is that there is a preference for the higher voltages to the detriment of the lower voltages' networks and codes.

2.2.3. **LW:** You're echoing what DO said before which is that there's a risk that the pace of change may be slowed as a result of code consolidation. You would opt for the alignment solution but also want to see an increased pace of change at lower voltages.

2.1.8. **LW:** The whole system alignment/consolidation project is trying to avoid industry having a different approach for each voltage level. We want a whole system approach as we now have a fair amount of Distributed Energy Resources (DERs) in the energy mix. I will take the feedback that both NGESO and DNOs need to start moving a lot faster.

2.2.4. **SM:** With a holistic approach, there is a risk that the higher voltage issues will require longer discussions due to the complexity of the transmission network, resulting in delayed decisions for the lower voltages.

2.2.5. **JW:** Around 70 to 80% of all new connections across the UK are picked up by the IDNO members and therefore it is important that the IDNO voice is heard.

LW: That's why I am here seeking your views. Am I right to assume that you'd like to keep things as they are and just make sure the GC and the DC are well aligned?

2.2.6. **DO:** SM covered the points very well. I do worry that we keep seeing things saying stakeholders and I don't know who these stakeholders are that think consolidation is better than leaving the 2 documents that can move at their own pace.

2.2.7. **DO:** I just challenge knowing who these stakeholders are. Is there a list saying the number of generation licensees, distribution licensees and transmission licensees supporting this? Over the years, I have never once heard anybody saying that it would be better if we moved at the speed of NGESO.

2.2.8. **LW:** If there is one thing I am going to take away, it's that we need to move things faster. Having been involved in the code modification process, I can see and understand how long it takes to make changes. However, what I haven't heard from you is whether the DC has any issues that you have concerns with, or if you are happy with the document as it is, think it could be simplified or digitalised?

2.2.9. **SM:** I'm not certain what you mean by 'digitalise'. To my mind, there's an electronic version and it's on the internet. If that's not digitisation, then I don't know it means.

The one thing that I would like to call out is we find generators at distribution don't always comply with what's said in the DC. Historically, when DNOs and IDNOs have challenged that with Ofgem, Ofgem have sided with the customer saying that we should not disconnect them. How we ensure

compliance and the consequences of not complying, is one of the challenges that we need to think about.

SM: The DC is a complicated and lengthy document and is not easy to understand from the customers perspective. Therefore, we pulled together a summarised version of the DC (created a number of years ago) which is available to all stakeholders and all customers to guide them about the content and what's required in DC.

If you start trying to combine the DC and GC, it's going to be even more complicated for users to understand what their obligations are and how to maintain compliance.

There is a concern that combining the DC and GC, makes that summarised version even longer which won't help the customers.

2.2.10. **LW** – Thank you very much.

2.3. Potential Solutions (Section 3.2 Digitalisation)

2.3.1. **DO:** By definition, it must be legally binding otherwise there is little point having the code.

2.3.2. **DO:** Under our license we have to comply, however it is not clear where are all the other distribution players (such as smaller generators, battery operators etc) lie. I would like to see that they also are mandated under license to comply.

2.3.3. **DO:** The other process in terms of this digitalisation would be a self-service process that somebody can go on and register what they are doing, how they are doing it, whether they are compliant and allow them to be able to change that through this AI platform. It is helpful if what's envisaged is that stakeholders can get involved in the process a lot quicker.

2.3.4. **LW:** Thank you very much for that DO. I suppose you are supportive of the digitalisation. The key one for you is that it should be legally binding and that all those bound by the DC should ensure that they meet their obligations i.e. the issue of non-compliance should be dealt with.

DO: Correct; the process of how non-compliance is dealt with needs to be clarified. In the past, in case of non-compliance, Ofgem have given direction but when push came to shove it was not enforced. By doing that it, it gives the impression that compliance is not that important.

2.3.5. **DO:** It is hard to police. If there is a sanction, who's going to push the button and say, XX, here's the case that you need to answer? ESO? FSO? Another entity? Whoever it is, would have to establish the non-compliance and communicate what the consequence is. The fact that there doesn't appear to be any consequences for non-compliance is the bigger problem. The only time you see consequences is when Ofgem has fined either transmission or distribution licenses.

2.3.6. **LW:** That is welcome feedback. The main message is aligning in terms of compliance across both transmission and distribution. For transmission, there's a process that GC parties have to follow prior to becoming operational and throughout the connection to the transmission network you have to demonstrate compliance. Therefore, harmonising this approach at distribution would resolve the issue that you're raising here.

2.3.7. **LW:** I've also had feedback where stakeholders have stated that enforcing compliance with an obligation on a connection on transmission which is not enforced for a similar connection at distribution, makes it an uneven market playing field. So that is something that needs to be taken forward.

2.3.8. **DO:** Agreed.

2.3.9. **SM:** Enforcing compliance at lower voltages should be well thought through because of the sheer volumes of connections and how realistic it would be for the DNOs and IDNOs to enforce it.

2.3.10. **LW:** How to realistically address enforcing compliance needs to be discussed between the DNOs and IDNOs and their stakeholders.

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

2.4.1. **DO:** I am not sure if there is value in undertaking a simplification piece of work given it could take 5 years. Where there are defects, stakeholders should raise modifications.

2.4.2. **JW:** An industry led approach would be preferred over the current governance of the ENA that is very slow. Anything being taken away from the ENA to increase the pace of change would be appreciated. By consolidating, we would be moving from a slow-moving administrator and an even slower one.

2.4.3. **LW:** My takeaway from this is that IDNOs do not have any concerns with the content of the DC but the pace of change. This is a governance issue.

2.4.4. **JW:** Correct – that's fair observation.

2.4.5. **DO:** Worth highlighting is that it is not the process that is a problem, it is the players involved in the process that cause the issues e.g. delays caused due to unavailability of resources to chair the meetings.

2.4.6. **LW:** Noted.

2.5. Potential Solutions (Section 3.5 Delivery of Solutions)

2.5.1. **DO:** The world is changing very quickly, and this could be an issue. DNOs have spent 5 years with Open Networks and yet some of the issues you raised are still pending yet they should have been addressed by Open Networks e.g. better ways of working and picking up the movement and traction that government are putting on it. On that note, we cannot afford to wait as we would be criticized. We need to get away from DNOs telling industry what to do and have the direction of travel driven by industry.

2.5.2. **DO:** The standards across all DNOs switchgear, designs and equipment require rationalisation and consolidation to create overall UK standards. There needs to be an agreement on what all DNOs should work against; not variant dependent on where your connection is.

2.5.3. **DO:** P2/7 should be added to DC.

2.5.4. **SM:** With the DC, Annex 1 documents require Ofgem approval whereas Annex 2 documents don't. Is there a similar arrangement with the GC? If not, how would that be managed in the new proposal?

2.5.5. **LW:** The 2 governance routes are 'Self Governance' (approved by the GC Review Panel) and Standard Governance (approved by Ofgem). The GC Review Panel will determine the governance route which depends on the complexity, materiality, and urgency of the modification.

Post Meeting Note: Please use this link (Slide 14) to see further related information.

2.5.6. **SM:** We need to make sure that the documents that currently do not need Ofgem approval do not get caught up, if consolidation results in a governance structure where Ofgem is the final decision maker.

2.5.7. **LW:** Noted. The objective of the digitalised WSTC project is to simplify the industry experience with the codes.

2.6. Key Benefits (Section 4)

2.6.1. These are benefits we would like to see but the frustration is the timeline it would take to get there.

3. Project Governance Sections; Decision Making (5.1), Proposed Terms of Reference – Steering Group (5.2), Stakeholder Engagement (5.3) & Schedule (5.4)

No comment

4. How to Provide Feedback

JW: The key takeaway is that although the INA will submit a consultation response on behalf of its members, the individual members should also submit a response.