Response to Digitalised Whole System Technical Code Consultation 1

Name	Mike Kay
Job Title	Director
Organisation	P2 Analysis Ltd
Contact Details	**mikekay@p2analysis.co.uk**

Q1.   What challenges do you have with using the technical codes?

No comment.

Q2.   Where there are challenges, please provide examples of areas where you would like to see change.

No comment.

Q3.   Are there further advantages and disadvantages of the potential solutions above?

I believe the Grid and D Codes are well aligned and do not believe this is a significant issue. There may be some minor examples - but I am not aware of any. I am aware of differences that are deliberate, appropriate and necessary.

Developing an overarching code whilst leaving the existing Grid and D Codes unchanged seems to offer no value at all. It would not avoid users having to refer to the detail in the codes where necessary, and adds another layer that does need to be referred to and also kept up to date etc.

Q4.   Which of the issues identified in section 2, (or by yourself in answer to Q1) would be addressed by each of the solution options?

The only outcome with possible advantages over the status quo Is the single WSTC, assuming It simplifies the text In the Grid Code, and possibly In the D Code and associated documents.

Q5.   Are there additional potential solutions for whole system alignment which could deliver value?

It would be good to incorporate both the SQSS and Relevant Electrical Standards into the Grid Code governance, so that all are governed in an identical way.

Q6.   Are there additional potential solutions for digitalisation which could deliver value?

I don't know of any.

Q7.   Which of the potential solution(s) for digitalisation do you see as providing the most benefit?

They would all provide some benefit – but I suspect Self Service will be very difficult to make work and be comprehensive. I cannot imagine how this can be done without significant input from existing code experts, which makes me believe that it is probably more cost effective to use this expert input to achieve an AI solution.

Q8.   What risks and/or opportunities do you see in digitalising codes in parallel to work on code alignment, potential consolidation, and the Energy Codes Reform programme? Please also share your views on how best to mitigate these risks.

Moving ahead with this project without the outcome of the ECR being known does seem to present some general risks to the project.

Digitizing codes sounds like a significant investment so should be undertaken on the near final WSTC rather than separately digitizing the existing codes – unless doing so can be shown to offer better value.

Q9.   Do you think the digitalised codes should be legally binding or for guidance only? Why?

Yes – if we expect users to be able to gain benefits from using a digitized version, there is no value if they have to check or second guess a non-digitized version. As far as possible the code administrators should assume the risk of errors between the digitized version and a legal version – although clearly this will not be simple to achieve for costs or liabilities incurred by the user.

Q10.   Do you see value in progressing these work packages independently of the ECR and do you think they should be progressed?

There does seem to be some opportunity to simplify the Grid Code. The level of detail is probably correct, but the structure in some places is unnecessarily complex; the use of definitions is particularly tortuous and hard to follow in some cases (genset, generating unit, power generating module etc spring to mind). The Distribution Code may suffer from some of the same problems – but to a much lesser extent, not least because it is a much simpler/shorter document. These changes could of course be progressed under existing governance.

As already stated, SQSS and the RES should be incorporated fully into the Grid Code governance. The documents themselves probably are best left as stand alone – although could be more formally referenced from the Grid Code.

P2/7 is effectively already in the D Code; it is a D Code governed document. There is no value in binding into the same file – the text would remain essentially distinct from the text in the D Code – there is no overlap.

Q11.   Are there other opportunities that could be considered?

None that spring to mind.

Q12.   Stakeholders have articulated that there is strong interdependence between options in whole system code consolidation or alignment (Section 3.1), digitalisation (Section 3.2) and the delivery of solutions (Section 3.5). Do you have a preferred combination of these solutions that you see as delivering the best value considering the issues implementing the solutions? Please provide a rationale for your response.

It Is very hard to answer this without knowing what the ECR will deliver, particularly in relation to governance.

But if stakeholders really believe that the codes are overly complex then simplification (with a view to integration) could be taken forward now under the existing governance. It is unlikely that such effort would be wasted: it would be a good basis for the WSTC.

If the appetite existed to go ahead with digitalization at this stage, then applying it to the Grid Code as proof of concept might have some value. The Grid Code is the most complex code – so is probably the only appropriate test. However as per Q8 we would need to be sure there is value in doing this work for the existing Code before simplification.

Q13.   Are there other aspects of the project delivery where you see risks and opportunities to mitigate these?

ECR outcome is the biggest risk. The second biggest risk is resources. Apart from the challenge of network licensees finding the necessary expert resources over the duration, even though stakeholders will benefit, I find it hard to believe that smaller stakeholders will be able to find the resources to engage consistently over the life of the project. Larger stakeholders might well stay the course, but they are not necessarily adept at representing the interests of smaller players.

Q14. Do you agree with the key benefits outlined above and can you see other benefits resulting from this project?

4.1 clearly has benefits, and it partly includes the understandability part of 4.4. 4.2 and 4.3 do not sound persuasive as arguments unless backed up by clear evidence. I accept that there are costs from the inefficiencies of the current code arrangements, and this is addressed in 4.1. But effect on overall market activity and innovation sounds unlikely without evidence.

4.5 is clearly beneficial too – but not just for cross cutting issues. Even single code issues can be tackled in such a way that the approach is more harmonized across the two codes. To an extent this is done now on a reasonable endeavours basis, but would be improved by a single process.

Q15. Do you think that the proposed governance structure will enable delivery of the project? Would you change any aspects? If so, why?

The structure is probably about right. Note that the ITCG is not really an advisory group – it is part of the DCRP that formally resolves IDNO representation at DCRP. The IDNO's trade body is the INA.

However more attention should be given to representing the interests of two fundamental stakeholders:

   i.   small players, ie those connected (or connecting) to DNO networks. They have no obvious single representative structure, trade body etc. Codes tend to be driven by the level of technical engagement from stakeholders: bigger players therefore have a disproportionate influence.

   ii. Manufacturers, and possibly standards bodies. The licences were written in 1990 and do not include manufacturers as stakeholders. This is perhaps understandable for organizations emerging from the CEGB. But 30 years on manufacturers are now fundamental to providing appropriate kit that meets network licensee's requirements. Most of the deeply technical developments in the Grid Code, and to a similar, albeit lesser, extent in the Distribution Code revolve around the expertise of manufacturers. In many cases they have far more relevant knowledge than Authorised Electricity Operators, so should be given seats at the table for both the project and in ongoing governance. It does not licences changes to achieve this – although clearly that would be helpful.

Q16. Which elements of the project would you, or your organisation, like to be involved in? If so, please state what capacity, and provide a short description of the perspective and value that you would bring to the project.

No comment at this stage.

Q17. What principles should apply when forming membership and ways of working for the various project groups?

In part this probably depends on the governance of the SG itself. Who does it report to? Who does it answer to? How does it balance its desires and recommendations with their costs?

There needs to be some way of ensuring there is balance in WGs too. The SG, excepting the deficiency of representation of smaller players, seems about right. The same balance must be found for the WGs. Although volunteers are always valuable, self-selected expertise is not always dispassionate.

Q18. What are your views on the proposed Terms of Reference for the steering group?

It feels a little too flexible and diffuse. There should be a clear institutional owner or sponsor for the work; someone to who the SG chair has to make reports, and who can both direct strategically and can assign resources if necessary.

Q19. Do you have further views on how to best include all the relevant perspectives in the governance of the project?	
See Q15.	
Q20. How do you think the steering group should make decisions, particularly if there is not consensus?	
This is why I believe there needs to be a formal sponsor to receive the output of the project and who can decide what to implement. In doing so any disagreements can be taken forward as majority and minority positions, which will be resolved by strategic decision of the sponsor.	
Q21. What are your views on the proposed stakeholder engagement? Is there more that can be done to ensure effective stakeholder engagement?	
Yes. The stakeholder engagement of the Accelerated Loss of Mains Programme has been a revelation - albeit the subject matter and relevant to small parties is rather more direct. Nevertheless, having seen how effective that stakeholder engagement is, it would be worth considering using the same approach using a PR agency. And although this has been particularly successful in reaching non-traditionally engaged parties, the agency has also been very successful in establishing effect communication lines with larger players.	
Q22. Would you like to attend the webinars? If so, please leave your contact details in your feedback.	
Yes, and you have them.	
Q23. Would you like to request a regular update from the project at your forum? If so, please leave contact details of your forum in your feedback.	
As Q22.	
Q24. What are your views on the proposed schedule?	
The first steering group date is too close – you need to pay attention to the points I suggest in relation to the project governance and take the necessary time to put those arrangements in place. Early Q1 in 2022 should be possible.	

This consultation is available online here:

https://www.nationalgrideso.com/industry-information/codes/digitalised-whole-system-technical-code

Please return responses to box.wholesystemcode@nationalgrideso.com before 5pm on 12th November 2021.