

Response to Digitalised Whole System Technical Code Consultation 1

Name	
Job Title	
Organisation	SSEN Transmission
Contact Details	

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

Users looking to connect to the system would greatly benefit from a whole system technical code (WSTC) which acts as an umbrella to pick out and link to the various criteria in D Code and the Grid Code that applies to their proposed connection. For example, criteria for connection of rooftop PV, or a power park module may differ to criteria for a large battery scheme or onshore/offshore windfarm, and it is not clear as to which criteria across Grid Code, D Code and the associated ERECs apply.

We therefore prefer the option of an 'Overarching WSTC' but as an umbrella for signposting to the necessary criteria/clause in the Grid Code/D Code (with Grid Code/D Code simplified or merged if possible), as we believe significant code simplification and consolidation may not be possible in the near term to create a single WSTC while still retaining the existing technical criteria and/or legislation in Grid Code, D Code, NETS SQSS, P2 and the associated ERECs.

We also believe that a number of the attributes listed under the Single WSTC can be achieved with an Overarching WSTC acting as an umbrella. For example, the overarching WSTC can be 'simplified and written in plain English' (which can then still signpost to specific criteria in the Grid Code/D Code) with a 'focus on outlining/signposting to the minimum technical standards'. The Overarching WSTC therefore does not need to be a long document and could include simplified summaries in plain English to add further context to the criteria which is being signposted. There should therefore be little repetition of the criteria/legislation included in the Grid Code/D Code.

We also believe that the NETS SQSS shall remain as a standalone document next to the Overarching WSTC for signposting. The NETS SQSS dictates the criteria by which transmission licensees shall use in the planning and operation of the NETS, whereas the Grid Code sets out the operating procedures and principles governing the relationship between the ESO and all NETS users/customers. The two overarching principles therefore deal with separate planning/operational issues. Our view is therefore that a more focused effort should be placed on establishing an 'Overarching WSTC' and the simplification/consolidation of the Grid Code and Dcode if possible (for signposting to).

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

We believe that the current main challenge relates to Users (as covered in Q1) understanding the specific criteria across the various codes which they need to adhere to. Hence why we feel the best option is to provide an 'Overarching WSTC' but to act as an umbrella for signposting to the necessary criteria/clause in the Grid Code/D Code (with GridCode/D Code simplified or merged if possible).

The NETS SQSS should remain as a standalone document as we don't believe this is where the main challenge is, and from a stakeholder point of view, inclusion of the NETS SQSS as an annex to the Grid Code or consolidated with the Grid Code in a single WSTC, might lead to confusion behind the principles of the NETS SQSS compared to the Grid Code.

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

Whereas the single WSTC would be useful as a single source of truth, we would see inclusion of the NETS SQSS in the single WSTC as a disadvantage as this could lead to confusion behind the principles of SQSS compared to Grid Code.

We also feel that there is a high risk of technical criteria/legislation being unintentionally omitted when trying to combine and simplify Grid Code, D Code, ERECs, SQSS and P2 into a single WSTC. We also expect that a single WSTC will not be achievable in the near term, and the project should focus on 'quick wins' initially to improve the process for network users as soon as possible. As such our preferred solution is to focus on an 'Overarching WSTC' but as an umbrella for simplifying the language used and signposting to the relevant criteria/clauses (already in the Grid Code and D code).

We feel there is a better chance of being able to combine/simplify the Grid Code and D Code (which have similar principles) to produce a 'whole system' code that the 'Overarching WSTC' can point too, but even this should not get in the way of creating the simplified umbrella document and digitising the Grid Code and D code as a first step (if combining the two codes can't be done in the near term).

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?

For the issues identified in Section 2 and by us in Q1, we believe that the Single WSTC and Overarching WSTC solutions, as well as our proposed solution in Q1 (an overarching WSTC as an umbrella document for signposting to a digitised Grid Code and D code), would resolve this issue for Users of the NETS.

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

Yes, as summarised in our response to Q1, Q2 and Q3.

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

We aren't aware of any.

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

We see the AI option with cross-code signposting providing most benefit as this will point the user to the specific criteria for which they need to comply with (either across the Grid Code and D Code or a consolidated whole system code of the two if possible in the near term) as well as make them aware of any potential modifications that are currently underway for which they may be required to comply with by the time of their connection.

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.

We believe that working on digitalisation and consolidation of the code in parallel has the potential benefit of completing the project earlier. However, it may not be practical as consolidation may require significant change that digitalisation may need to consider, which could lead to inefficiencies.

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

If developing an overarching WSTC mainly for signposting purposes (i.e. as per our solution detailed in our responses to Q1, Q2 and Q3) then this could be for guidance only (as it will not be replacing any criteria/legislation in the existing codes) – although there should still be the requirement to maximise quality and minimise errors.

However, for the 'Overarching WSTC' option and 'Single WSTC' option as proposed in the consultation, the digitalised code should be legally binding to maintain legislation that is being replaced in the original codes.

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

We need to ensure that the 2 pieces of work (ECR and WS Code) align to avoid any potential conflicts or later contradictions. We believe that there is value in progressing these works independently of the ECR, but focus should be on the simplification and consolidation of the Grid Code and D code (which have similar principles) to form a whole system code, rather than working on them separately, if this is achievable in the near term (if not then simplification and digitalisation of the Grid Code and D code separately is a good first step).

In addition, as covered in our response for Q1, Q2 and Q3, we do not see the need or benefit in including the NETS SQSS in the Grid Code – the NETS SQSS should remain as a standalone document.

Q11. Are there other opportunities that could be considered?

As mentioned in our response for Q10, we believe there is the opportunity to simplify and consolidate the Grid Code and D code (which have similar principles) to form a whole system code. This can progress independent of the ECR outcome.

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.

The ideal solution would be to have the decision on consolidation of the codes landed. Our preference/proposal for an overarching WSTC (for signposting) could be realised as the first step towards AI digitalisation in conjunction with delivery of digitalisation focussed on the Grid code and D code as separate projects (or in conjunction with the consolidation of the Grid Code and D code into a single digitised whole system code if achievable in the near term). This approach would offer 'quick win' benefits to Code users by helping simplify the navigation and application of the requirements they need to meet and thereby helping new and existing entrants to the market.

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

The risks depend on the degree of interdependency between whole system code consolidation and digitalisation. If the degree of interdependency is low such that quick modifications can be made to the AI platform, for example, following changes to the underlying code then it's advantageous not to wait until the consolidation is done. However, if a lot of work will need to be done then it's better to wait for the ECR decision.

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

Yes - the WSTC project could provide faster decision making and the opportunity to highlight, discuss and resolve T&D issues in targeted forum(s). Digitalisation could help improve visibility of the codes and their requirements and provide greater accessibility to users. The project also offers the chance to improve the quality of the codes by helping easily identify inter and intra code dependencies and potential (otherwise hard to spot) defects.

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

From Fig 2, it seems that the Steering group will get directions from both Code Panel and Ofgem/BEIS. How manageable is this? What is the relationship between Code Panel and Ofgem/BEIS? Should there not be one overall authority and in this case should it be OFGEM/BEIS?

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.

We would like to be involved in the whole system alignment, simplification and consolidation of the Grid Code and D code. We have people in our organisation who are code panel members and/or involved in different working groups that look at the codes, and others who have been involved in the ENA to Identify barriers of misalignment of codes to whole system and their knowledge in this area would be helpful.

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

The membership should be largely composed of:

- people who use these codes in their work
- people with experience of code panel membership (preferably with long term experience)
- code administrators
- panel chairs.

It will be good to also have people who have experience/knowledge in countries/regions where they have already consolidated technical codes. These people can share their experience and mistakes made which we should avoid.

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

They seem adequate

Q19. Do you have further views on how to best include all the relevant perspectives in the governance of the project?

As stated In Q15, you may need to think about how the Code Panel works with BEIS/OFGEM as one cannot tell from Fig 2. Also, the Implications of the Steering Group receiving directions from both Code Panel and BEIS/OFGEM.

Q20. How do you think the steering group should make decisions, particularly if there is not consensus?

If there is no consensus, the Code Panel should decide based on the information presented to it by the Steering Group which should highlight areas of disagreement.

Q21. What are your views on the proposed stakeholder engagement? Is there more that can be done to ensure effective stakeholder engagement?

So far, the stakeholder engagement is adequate. However, it is important to carry out a stakeholder engagement survey at the end of the project as things may change down the line.

Q22. Would you like to attend the webinars? If so, please leave your contact details in your feedback.

Yes – contact details are:

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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.

Use emails in Q22 above

Q24. What are your views on the proposed schedule?

The schedule only covers Phase 1 of the project. It would have been good to have a full schedule of the project even if it means that some things may be pushed around along the way. This would give participants an idea of what they should expect.

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.