Digitalised Whole System Technical Code

Consultation 1

Consultation response made on behalf of:

Western Power Distribution (South West) plc

Western Power Distribution (South Wales) plc

Western Power Distribution (East Midlands) plc

Western Power Distribution (West Midlands) plc

Challenges

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

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

As a DNO, WPD are relatively familiar with the technical codes. We find it is mainly some of our customers who can find navigating the codes challenging at times. This is often when they are new to the process or if Grid Code requirements apply, in addition to Distribution Code requirements. The main challenge is establishing all the areas that are applicable – the current pdf search option helps but it doesn't necessarily guide a user to the correct sections of the codes that need to be reviewed. Improvements and smarter search intelligence in these areas are welcomed.

In addition to the core work to digitise and consolidate or align the codes, it would be sensible to also produce better guidance for users in navigating the current codes. This would have short term benefits to users and the guidance documents could also then be adapted later, when the core work has concluded.

Whole System Consolidation or Alignment

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

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?

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

At this stage of the process and until more detail is developed, it is difficult to comment on advantages and disadvantages.

We agree that doing nothing it not an option as it won't meet the changing environment. It is important that changes are staged and reviewed as the project develops. If consolidation becomes the preferred option, it will need to be thought about and structured in such a way as to avoid

having a single document that is large, hard to follow and difficult or time consuming to modify. E.g. it wouldn't be sensible to re-issue the whole document each time, so should it have common sections and separate sections dependant on voltage of connection or the type and size of customer. This could be distribution and transmission specific sections in some form as well as a shared section.

As part of the process, opportunities should in any case be taken to seek greater alignment between existing requirements of the Grid and Distribution Codes.

Digitalisation

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

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

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.

Digitalisation of the codes is key for improved user access to key sections, clauses and paragraphs enabling them to identify and review important information at the start of a project. Digitalisation should also point to other supporting information within the codes or the supporting standards with the primary goal of supporting the user in assessing and meeting their code obligations and providing the right information to the network operator.

Digitalisation of codes will deliver significant value for all organisations involved from the creator to individual users where the solution is implemented utilising a standardised framework and governance approach; akin to a Wikipedia approach to information access, linkage and lineage. Additional to current proposals, what has not been explicitly discussed is the value and benefit that comes from enabling a digital community of users to discuss points, issues and resolutions in a collaborative manner, akin to a GitHub repository or other. This would provide a constant capability to understand end user concerns, queries and issues to prioritise engagement, amendments and points of clarification to support the user journey.

The ability to be guided to relevant elements of often large documents will be of enduring benefit as well as enabling dynamic links to separate but related documents, and their specific sections. Another key benefit is version control and access for all users, enabling a digitised documents support to the user to ensure they're accessing the latest version and can easily track the timeline of versions and their impacts; this is demonstrated in documents such as the Health and Safety at Work Act.

If the group eventually determined that a single WSTC was not the preferred end solution, then option '5' in Figure 1 ('Self-serve and signposting' aligned with 'Introduce overarching WSTC and retain existing codes') will provide value to users guided insight with a common front end and access point without the need for a single consolidated view – from a digitisation point of view, a decentralised approach is appropriate where a standardised platform is utilised as this should ensure that data and information is interoperable between 'documents' for greater insight and to inform the user more effectively of the requirements.

The implementation of AI is significant in an application such as this, where a number of key risks exist, specifically in the example defined; user data to drive appropriate references and sections. The burden of responsibility to understand and apply relevant codes shifts by taking this approach. It

also creates an opportunity for digitalisation to streamline the interaction and utilisation alongside an engaged digital community, where key user groups can be defined and tested effectively. The scope, roles and responsibilities would need to be carefully designed and communicated to avoid AI not identifying sections of codes that were applicable to an end user/customer.

Legal Considerations

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

Advice should be sought on this but as the codes are legal documents, we would assume that a legally binding "hard-copy" of the codes must also be available and users should be told to ultimately refer to this version to ensure all requirements are met. This would cater for user or system errors with the digital version.

The group could look to other legal documents or Acts that have been digitised, either in UK or abroad, to see if solutions to this have already been considered.

Work that can progress independently of the ECR outcome

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

Q11. Are there other opportunities that could be considered?

We consider that work can be done on the alignment or consolidation and digitalisation of the codes in parallel, providing ECR decisions are considered. There should be a process and regular communication between the two working groups to that this project is able to incorporate the recommendations of the ECR in order to avoid extra costs or future work or developing solutions that are not ultimately compatible.

Delivery of Solutions

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 delivering the best value considering the issues implementing the solutions? Please provide a rationale for your response.

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

There is a considerable amount of work needed by the industry in developing the solutions and more information is probably needed to comment on the phasing but the work should be staged and reviewed at each stage. With this in mind, work on the scope of the WSTC and digitisation could continue independently of the ECR timescale, particularly if the outputs were 'no regrets'.

Key Benefits

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

We agree with the benefits as set out in the consultation. As mentioned already, it will be important to ensure that the end chosen solution achieves these and that we don't increase timescales or add extra hurdles, when it comes to updating/modifying future code(s).

Project Governance

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

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

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

We believe the proposed governance structure, as well as the workgroup structure looks sensible. Depending on the subject area, WPD will look to contribute either directly or through the ENA.

Proposed Terms of Reference - Steering Group

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

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

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

There are a number of different stakeholders on the Steering Group and we support that. DNO representation is part of the core team and we suggest the number of DNO's on the group should be two if the choice is between one or two (as noted in the consultation documents). Industry involvement and engagement in this project is also essential to ensure the project deliverables are fit for purpose.

Ideally, decisions will be by consensus but if this is not possible, a majority view should be taken or if significant enough, referred to either Ofgem or an independent body.

Stakeholder Engagement

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

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

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.

The level of proposed stakeholder engagement looks sensible. WPD are already engaged with the process and we will continue to be involved.

Schedule

Q24. What are your views on the proposed schedule?

With commitments around RIIO ED2 business plans and with the Christmas holiday season coming up, we would suggest that the first Steering Group is held in January 2022, rather than in December.