

Code Administrator Meeting Summary

GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Stations requirements

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Contact Details

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Key areas of discussion

The Workgroup discussions are summarised according to agenda items:

Licence Exempt Embedded Medium Power Stations (LEEMPS) (slides 3 - 10 of WG Planning presentation pack)

AJ delivered a presentation on background and features of the Licence Exempt Embedded Medium Power Stations (LEEMPS). AJ clarified that LEEMPS (introduced in 2006) is different to the Licence Exempt Generation Agreements (LEGA) which was introduced in 2001 noting that LEEMPS replaced LEGAs. The LEGA agreement was introduced following the Utilities Act 2000 to provide some assurance to NGEN that licence exempt Generators were capable of meeting minimum technical requirements especially the early generation of windfarms. On the other hand, LEEMPS was introduced following the implementation of Grid Code requirements for new and renewable forms of generation (Grid Code modification H/04). The LEEMPS arrangements placed obligations in the Distribution Code requiring licence exempt embedded medium Power Stations to meet specific obligations in the Grid Code with any site-specific requirements being covered in appendix E between NGEN and the DNO. Under this arrangement there is no direct agreement between NGEN and the licence exempt embedded medium power station as the contractual arrangements are then backed off between the DNO and the licence exempt embedded medium Power Station. This enduring arrangement replaced the need for LEGAs.

The following points were noted:

- GC0117 - Option 1 (10MW) and GC0117 - Option 2 (100MW) under GC0117 would remove the need for LEEMPS going forward as there is no concept of medium power stations.
- There is an option of a hybrid approach to merge LEEMPS and BELLAs (LEEMPS +) e.g., under this option there could be the introduction of a new class of medium power station for the whole of GB of 10-100MW which would include a BM participation element similar to BELLAs.

The advantages are:

- The Generator only submits the data once to the DNO who passes it to the ESO
- Builds on the Open Networks solution
- ESO has visibility and control which includes increased numbers in the BM which should have a cost benefit
- DNOs have knowledge of BM instructions from the ESO and the ability to flag constraints
- The LEEMPS + approach does however need more thought particularly in terms of cost and interactions with the BM/Elexon in addition to the Future of Balancing
- Appendix G is a Q management process.
- How would new LEEMPS be identified in future particularly in relation to data submissions and obligations.

During the meeting concerns were raised over the service that could be provide under commercial arrangements e.g., demand management whereas the LEEMPS + arrangements on relates to licence exempt embedded medium power stations and whether this option hinders a level playing field for all.

Threshold Matrix – Feedback from ESO (slide 12 of WG Planning presentation pack)

- Following Workgroup members' comments and suggestions, DH/AJ took an action to update the threshold document and matrix and re-circulate to the Workgroup for further review.

Retrospectivity Matrix Update (slide 13 of WG Planning presentation pack)

The Workgroup made the following suggestions:

- Operational data will trigger Control and Despatch costs and it should be highlighted in which of the categories these costs fall into.
- All columns in table to be updated for the purpose of clarity
- ESO to review comments received and feedback to WG

NGESO IT Proposed Implementation Timeline

Daniel Arrowsmith from NGESO IT Department delivered a short presentation on the ESOs tentative timeline and delivery expectations for certain options of this modification. The following points were noted:

- It is beneficial for IT to get involved in Code changes at early stages ahead of implementation phase to ensure that delivery plan is achievable, and delivery is timely and within budget and get direct feedback from Control Engineers at ENCC.
- If the Workgroup decide to proceed with the 10MW option, implementation cannot take place until the latter part of the decade due to current ESO resourcing capability and when various IT systems are upgraded/replaced as part of NGESO's digitisation strategy. With this option there is a proposal to have a phased approach with an initial move to 30MW before transitioning to 10MW
- If the workgroup decides to proceed with the 30MW option (either on its own or as part of a phased approach to a 10MW option), this could be implemented in 2025.
- It was noted that that the issues of resource limitation issues should be highlighted to BEIS or Ofgem as this could accelerate the progress of this modification and several other on-going and upcoming projects / code change modifications.
- Workgroup asked whether use of Wider Access Application Programming Interface (WAAP) software technology could speed up implementation. Explained that the interfaces were not the main factor for the timelines but agreed that regardless it would be reasonable to assume WAAP could be used as part of the technical solution for GC0117, under the same conditions as per Wider Access.
- A request to have a visual presentation of assumptions and implications and business case updates with the application of Wider Access Application Programming Interface (WAPI) software technology.

The NGESO potential timeline document would be presented at a future Workgroup meeting

Draft Implementation Timeline

- DH advised that the IT's proposed timeline will need to be revised to take into account resource capability and feasibility of implementation from the IT's perspective.
- Concern that the wide time gap in the proposed timeframe for implementation could mean that at the time a decision is made assuming the solution is approved, the solution may become obsolete due to changes between the Authority decision and implementation.

Open Networks Update

- The Open Networks Team sent their apologies to the Workgroup and advised that they will prepare updates ahead of the next workgroup meeting.

Registered Capacity – Legal Viewpoint (slides 17 - 19 of WG Planning presentation pack)

- There is concern that the current definition of Registered Capacity for Power Stations does not clearly cover the situation where demand is segregated between the demand used to operate the Power Station alone or demand used at the site for other purposes over and above operation of the Power Plant.
- AJ advised that he had discussed this with Legal and it was unclear the difference between a Power Station and a Site. This issue was recognised but there are significant concerns

over unintended consequences particularly in respect of charging. ESO to make further enquires in relation to this issue.

Survey Questions

- No further responses received (asides from previous 6). There were discussions around making changes to the Questionnaire to encourage higher stakeholder participation and contribution.
- It was suggested that the DNOs circulate the questionnaire to their key customers with a view to obtain a wider input to the questionnaire as it was acknowledged that responses to the generic email via the Grid Code/Distribution Code email account may have a limited response rate.

SQSS Impacts

- AJ noted that, **GC0117** could also impact the SQSS (Section 11, Terms and Definitions) in relation to the definition of a Large Power Station. A WG member suggested that the SQSS definition could potentially not need to be amended but it was agreed that the SQSS Panel should be made aware of the potential impacts.

Actions log review

- The Workgroup talked through each action in the order it had been logged. The Workgroup agreed to close actions **10, 17, 25, 27** and **29**. Current open actions can be found in the Actions log that would be circulated within the Workgroup papers.

Next Steps

- The next workgroup meeting is to be held 18 March 2022. ENA and NGESO IT presenters to be invited to share progress updates.
- The Workgroup to review draft report and add comments and suggestions.
- The Workgroup to review matrix thresholds document for further thoughts and comments

Participants

Attendees	Initial	Company	Position
Nisar Ahmed	NA	Code Administrator National Grid ESO	Chair
Banke John-Okwesa	BJO	National Grid ESO	Technical Secretary
Alan Creighton	AC	Northern Powergrid	Workgroup Member
Calum Watt	CW	SSEN Transmission	Workgroup Member
Garth Graham	GG	SSE Generation	Proposer
Graeme Vincent	GV	SP Energy Networks	Workgroup Member
Isaac Gutierrez	IG	Scottish Power Renewables	Workgroup Member
Mike Kay	MK	Electricity North West	Workgroup Member
Paul Youngman	PY	Drax	Workgroup Member

Richard Woodward	RW	National Grid Electricity Transmission	Workgroup Member
Tim Ellingham	TE	RWE	Workgroup Member
David Halford	DH	National Grid ESO	ESO Representative
Tony Johnson	TJ	National Grid ESO	ESO Representative
Dan Arrowsmith	DA	National Grid ESO	IT Representative
Gilvan Reis de Souza	GR	National Grid ESO	IT Representative
Helen Young	HY	National Grid ESO	IT Representative

For further information, please contact the Code Administrator.