

Grid Code Alternative and Workgroup Vote

GC0141: Compliance Processes and Modelling amendments following 9th August Power Disruption

Please note: To participate in any votes, Workgroup members need to have attended at least 50% of meetings.

Stage 2 - Workgroup Vote

2a) Assess the Original and WAGCMs (if there are any) against the Grid Code objectives compared to the baseline (the current Grid Code).

2b) Vote on which of the options is best.

Terms used in this document

Term	Meaning
Baseline	The current Grid Code (if voting for the Baseline, you believe no modification should be made)
Original	The solution which was firstly proposed by the Proposer of the modification
WAGCM	Workgroup Alternative Grid Code Modification (an Alternative Solution which has been developed by the Workgroup)

The Applicable Grid Code Objectives:

- a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity
- b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);
- c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;
- d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and
- e) To promote efficiency in the implementation and administration of the Grid Code arrangements

Workgroup Vote

Stage 2a – Assessment against objectives

To assess the Original and WAGCMs against the Grid Code objectives compared to the baseline (the current Grid Code).

You will also be asked to provide a statement to be added to the Workgroup Report alongside your vote to assist the reader in understanding the rationale for your vote.

AGCO = Applicable Grid Code Objective

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Afshin Pashaei, NGET					
Original	N	N	N	N	N	N
WAGCM1	N	N	N	N	N	N
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
Voting Statement: Independent Engineer concept will add to the complexity, cost and slowing down the process and ambiguity in accountability without bringing more benefit to the compliance process. The User has responsibility to meet the technical requirements and ESO to do compliance assessment. Independent Engineer will not add more nor bring any further clarifications to the process. ESO should have resources to carry out these assessments.						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Alastair Frew, Drax Generation Enterprise Ltd					
Original	Neutral	N	N	Neutral	Neutral	N
WAGCM1	Neutral	N	N	Neutral	Neutral	N
WAGCM2	Neutral	N	N	Neutral	Neutral	N
WAGCM3	Neutral	N	N	Neutral	Neutral	N
Voting Statement: The proposed introduction of a third-party Independent Engineer appears to be a further step in the reduction in the ESO duties whilst passing them on to Users to contract third-parties along with the additional costs. It also seems to assume that the User and their suppliers are not capable of doing these activities and these are being passed on to a third party who does not appear to have any responsibility as the final agreements are between the ESO and the User						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Ben Marshall, HVDC Centre					
Original	Y	Y	Y	Y	Y	Y
WAGCM1	N	N	N	N	N	N
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
<p>Voting Statement:</p> <p>We recognise that there are practicality challenges if the independent engineer is used for potentially every connection, we cannot see that there is a magic NMW level or status stage that should direct or limit its involvement. More broadly CUSC and Grid Code already describe some limitations to applicability, and both Company and User have an ability to direct independent engineer involvement appropriate to their given project.</p> <p>As noted within the working group it may be the need for an independent engineer role interacts with the FSO consultation- and as a result we are in agreement with an Independent Engineer role providing it is not otherwise defined within an FSO role.</p>						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Christopher Smith, National Grid Ventures/National Grid Interconnector Holdings Ltd					
Original	N	N	N	N	N	N
WAGCM1	N	N	N	N	N	N
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
<p>Voting Statement:</p> <p>The proposals only add cost and delay to USERS of the system. Irrespective of the review by the independent engineer THE COMPANY will still be reviewing and signing off the documents</p>						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Colin Foote, SP Energy Networks					
Original	N	N	N	N	N	N
WAGCM1	N	N	N	N	N	N
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
<p>Voting Statement:</p> <p>The Independent Engineer would add cost and complexity with no clear benefit. Ofgem's comment on there being a reliance on self-certification should be a prompt for the ESO to do more in this area, not introduce another party.</p>						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Isaac Gutierrez, Scottish Power Renewables (UK) Limited						
Original	N	N	N	N	N	N
WAGCM1	N	N	N	N	N	N
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
<p>Voting Statement:</p> <p>SPR considers that an Independent Engineer is not required as no clear definition has been given so far regarding level of expertise of the independent engineer. SPR also considers that the responsibilities of an independent engineer should fall within NGESO.</p>						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Mark Horley, National Grid ESO						
Original	Y	Y	Y	Y	Y	Y
WAGCM1	Y	Y	N	Y	Y	N
WAGCM2	Y	Y	N	Y	Y	N
WAGCM3	Y	Y	N	Y	Y	N
<p>Voting Statement:</p> <p>The original is an administratively simple proposal applying to all Users. The Alternatives restrict the application of independent engineer scrutiny to larger projects while smaller projects, of which there are many and collectively could impact on network security, are not subject to independent scrutiny. The Alternatives include that the Independent Engineer is checking for compliance against the Connection Conditions (The ESO role) rather than that the simulations have been done in an appropriate manner.</p>						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
Marko Grizelj, Siemens Energy Ltd						
Original	N	N	Y	N	N	N
WAGCM1	N	N	Y	N	N	N
WAGCM2	N	N	Y	N	N	N
WAGCM3	N	N	Y	N	N	N
<p>Voting Statement:</p> <p>Due to the concerns regarding the scope, contractual responsibility, cost, project timelines and qualifications associated with an independent engineer, without a corresponding equivalent benefit to the current process, I do not believe an independent engineer facilitates the overall AGCOs better than the baseline.</p>						

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Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Martin Aten, Uniper Technologies Limited					
Original	N	N	N	N	N	N
WAGCM1	N	N	N	N	N	N
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
Voting Statement: Independent engineer will add complexity and costs, while liability remains with the User anyway, but can be used by choice by either party if circumstances require.						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Michael Smailes, Offshore Renewable Energy Catapult					
Original	N	N	Y	Y	Y	Y
WAGCM1	N	N	Y	Y	Y	Y
WAGCM2	N	N	N	N	N	N
WAGCM3	N	N	N	N	N	N
Voting Statement:						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Nicola Barberis Negra, Orsted Hornsea Project Three Uk Ltd					
Original	Y	Y	Y	Y	Neutral	Neutral
WAGCM1	Y	Y	Y	Y	Y	Y
WAGCM2	Y	Y	Y	Y	N	N
WAGCM3	Y	Y	Y	Y	N	N
Voting Statement: I think this should be applicable to project above a certain MW to ensure smaller projects are not affected by this additional review in terms of budget and timescale. I also believe that this process should only be applicable to the first compliance process and not to LON or any other material change (Mod App or similar processes): the objective of the independent Engineer is to provide an initial screening review of the compliance submission from a User, to ensure no evident errors or mistakes are included, but it does not eliminate any of the SO's responsibilities in reviewing and approving such submission. So, this process would be suitable for the initial compliance process to achieve the first FON. However, for process such an LON or in case of material changes, only a part of the compliance process is often expected to be repeated and including the review of an independent engineer to them would only cause complications and potential delays with no evident benefits						

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Pukar Mahat, Siemens Gamesa Renewables					
Original	Y	Y	Y	Y	Y	N
WAGCM1	Y	N	Y	Y	Y	Y
WAGCM2	Y	N	Y	Y	Y	Y
WAGCM3	Y	N	Y	Y	Y	Y

Voting Statement:

The option to notify change which would impact on grid compliance will reduce the burden to all stakeholders by limiting the use of IE without compromising the security and efficiency of electric system.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Sigrid Bolik, Siemens Plc					
Original	Y	Y	Y	Y	Neutral	Y
WAGCM1	Neutral	Yes	Neutral	Neutral	Neutral	N
WAGCM2	Neutral	Yes	Neutral	Neutral	Neutral	N
WAGCM3	Y	Y	Y	Y	Neutral	Y

Voting Statement: Favourite:

All proposed Options support improvement in supporting ongoing compliance of equipment.

Workgroup Member	Better facilitates AGCO (a)	Better facilitates AGCO (b)	Better facilitates AGCO (c)	Better facilitates AGCO (d)	Better facilitates AGCO (e)	Overall (Y/N)
	Tim Ellingham, RWE Supply and Trading					
Original	Y	Y	Y	N	N	Y
WAGCM1	Y	N	Y	N	N	Y
WAGCM2	Y	N	Y	N	N	N
WAGCM3	Y	N	Y	N	N	N

Voting Statement:

Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), or WAGCMs 1 - 3)

Workgroup Member	Company	BEST Option? (Original, Baseline, WAGCMs)	Which objective(s) does the change better facilitate? (if baseline not applicable)
Afshin Pashaei	NGET	Baseline	N/A
Alastair Frew	Drax Generation Enterprise Ltd	Baseline	N/A
Ben Marshall	HVDC Centre	Original	All
Christopher Smith	NG Ventures/NG Interconnector Holdings Ltd	Baseline	N/A
Colin Foote	SP Energy Networks	Baseline	N/A
Isaac Gutierrez	Scottish Power Renewables (UK) Limited	Baseline	N/A
Mark Horley	NGESO	Original	c
Marko Grizelj	Siemens Energy Ltd	Baseline	N/A
Martin Aten	Uniper Technologies Limited	Baseline	N/A
Michael Smailes	Offshore Renewable Energy Catapult	WAGCM1	c, d, e
Nicola Barberis Negra	Orsted Hornsea Project Three Uk Ltd	WAGCM1	All
Pukar Mahat	Siemens Gamesa Renewables	WAGCM3	a, c, d, e
Sigrid Bolik	Siemens Plc	WAGCM3	a
Tim Ellingham	RWE Supply and Trading	Baseline	N/A

Of the 14 votes, how many voters said this option was best.

Option	Number of voters that voted this option as better than the Baseline
Original	2
Baseline	8
WAGCM1	2
WAGCM2	0
WAGCM3	2