

Grid Code Alternative and Workgroup Vote

GC0148: Implementation of EU Emergency and Restoration Code Phase II

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

Stage 1 - Alternative Vote

If Workgroup Alternative Requests have been made, vote on whether they should become Workgroup Alternative Grid Code Modifications (WAGCMs).

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 1 – Alternative Vote

Vote on Workgroup Alternative Requests to become Workgroup Alternative Grid Code Modifications.

The Alternative vote is carried out to identify the level of Workgroup support there is for any potential alternative options that have been brought forward by either any member of the Workgroup OR an Industry Participant as part of the Workgroup Consultation.

Should the majority of the Workgroup OR the Chairman believe that the potential alternative solution would better facilitate the Grid Code objectives than the Original proposal then the potential alternative will be fully developed by the Workgroup with legal text to form a Workgroup Alternative Grid Code modification (WAGCM) and submitted to the Panel and Authority alongside the Original solution for the Panel Recommendation vote and the Authority decision.

“Y” = Yes

“N” = No

“-“ = Abstain

Workgroup Member	Alternative 1: Original + Compliance Article 40 ERNC (SSE)	Alternative 2: WAGCM1 + Normal and Alert state definitions within the Grid Code (ESO)
Alan Creighton	Yes	Yes
Alastair Frew	Yes	Yes
Garth Graham	Yes	Yes
Tony Johnson	Yes	Yes
Julie Richmond/Priyanka Mohapatra (Alternate)	Yes	Yes
Graeme Vincent	Yes	Yes
Richard Wilson/Bill D' Albertson (Alternate)	Yes	Yes
WAGCM1		WAGCM2

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)
Alan Creighton – Northern Powergrid						
Original	Yes	Neutral	Yes	Yes	Neutral	Yes
WAGCM 1	Yes	Neutral	Yes	Yes	Neutral	Yes
WAGCM 2	Yes	Neutral	Yes	Yes	Neutral	Yes
Voting Statement: The Original and WAGCMs should help to enhance the resilience of the system to an event and the restoration of the system following a partial or total shutdown. WAGCM 1 is the better option as it provides additional information to stakeholders who may need to respond to an event without prescribing the system state information that was proposed in GC0133 which was rejected by Ofgem.						

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	Neutral	Yes	Yes	Neutral	Yes
WAGCM 1	Neutral	Neutral	Yes	Yes	Neutral	Yes
WAGCM2	Neutral	Neutral	Yes	Yes	Neutral	Yes
Voting Statement: This proposed modification enhances system security by adding more measures to reduce the chances of system collapse.						

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)
Garth Graham – SSE Generation						
Original	Neutral	Neutral	Neutral	Yes	Neutral	Yes
WAGCM 1	Neutral	Neutral	Neutral	Yes	Neutral	Yes
WAGCM2	Neutral	Neutral	Neutral	Yes	Neutral	Yes
Voting Statement: GC0148 (Original and WAGCMs 1 and 2) seeks to ensure that all the remaining legal obligations on parties as set out within the ERNC (which is now retained EU law and therefore as such is applicable in GB) have been codified within the Grid Code. This, in my view, better facilitates Applicable Objective (d) whilst being neutral with regard to the other Objectives.						
Whilst the Original and the two WAGCMs are better, WAGCM1 is best as it reflects: (i) the specific legal obligations on the ESO, as per Article 40 (2)-(4) of ERNC, to notify stakeholders						

(something the ESO, it would seem, may in some cases have potentially inadvertently not done?); and (ii) this then ensures that those notified stakeholders can then discharge their own legal obligations under ERNC as per Article 40 (1) (as they will, for example, know this information will be received by them from the ESO via BMRS, rather than an unknown route) whilst also avoiding the serious potential risk to operational security of the transmission system (if this information exchange is not performed – which would be the case with the Original). As the travaux préparatoires (as set out in the WAGCM1 proposal form) makes clear, this is “necessary to guarantee the Operational Security of the Transmission System at any time” as “Information Exchange is an essential topic for the work of the TSO and for guaranteeing the Operational Security of the Transmission System.”

Whilst WAGCM2 has the core element of WAGCM1 I’m mindful of the Authority’s GC0133 decision letter in regard to the ‘Alert’ or ‘Awareness’ State (which is the only difference between WAGCM1 and WAGCM2) and given this statement from the Authority then, overall, WAGCM1 is best (when compared to the Original, WAGCM2 or the Baseline).

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)
	Tony Johnson – ESO					
Original	Yes	Yes	Yes	Yes	No	Yes
WAGCM 1	No	No	No	No	No	No
WAGCM 2	Yes	Yes	Yes	Yes	No	Yes

Voting Statement: This modification is a legal requirement to comply with retained European Law. As such we agree that both the original and WAGM2 better facilitate the Grid Code objectives, particularly objective (d). The requirements expressed in WAGCM2 are already fulfilled by the ESO and, given that the legal obligations also apply directly, would question whether this addition to the code is necessary given that no requirements are placed on users by the WAGCMs. The requirement to share the system state on BMRS in the emergency/blackout/restoration condition is something that the ESO have said they will do preferably without a code obligation since this would tie the Control Room to a timeframe during what could be a difficult and busy period. This argument was previously explored in modification GC0133 which was rejected by Ofgem as in addition the benefit was not demonstrated and there was a risk of misreporting – although it is noted that this time the ‘alert’ status is not included. Therefore, on balance the ESO continues to support the original.

The ESO does not support WAGCM1 because there is no clear definition of when the system moves from Emergency Blackout or Restoration States into Normal or Alerts States.

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)
	Julie Richmond/Priyanka Mohapatra (Alternate)– Scottish Power Renewables (UK) Limited					
Original	Yes	Neutral	Yes	Yes	Neutral	Yes
WAGCM 1	Yes	Neutral	Yes	Yes	Neutral	Yes
WAGCM 2	Yes	Neutral	Yes	Yes	Neutral	Yes

Voting Statement: The original and alternative both better facilitate the applicable Grid Code Objectives than the baseline relating to the requirement to implement articles 15(5) – 15(8), article 41 and article 42(1), (2) and (5) of the EU Emergency and Restoration Code (NCER). It is important these are implemented by 18 December 2022.

WAGCM1 better facilitates the implementation of Article 40(2)-(4).

Both the original and WAGCM1 provide further clarity relating to the treatment of electricity storage modules during low system frequencies for Article 15(3).

SPR support the Distributed ReStart project being carried over into GC0156.

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)
Graeme Vincent – SP Energy Networks						
Original	Yes	Neutral	Yes	Yes	No	Yes
WAGCM 1	Yes	Neutral	Yes	Yes	Yes	Yes
WAGCM 2	Yes	Neutral	Yes	Yes	Yes	Yes

Voting Statement: All proposed modifications implement the remaining areas of the retained version of the EU Network Code on Electricity Emergency and Restoration which are required prior to 18th December 2022.

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)
Richard Wilson/Bill D'Albertson (Alternate) – UK Power Networks						
Original	Yes	Neutral	Yes	Yes	No	Yes
WAGCM 1	Yes	Neutral	Yes	Yes	No	Yes
WAGCM 2	Yes	Neutral	Yes	Yes	No	Yes

Voting Statement: No Statement provided

Stage 2b – Workgroup Vote

Which option is the best? (Baseline, Proposer solution (Original Proposal), WAGCM1 or WAGCM2)

Workgroup Member	Company	BEST Option?	Which objective(s) does the change better facilitate? (if baseline not applicable)
Alan Creighton	Northern Powergrid	WAGCM1	a, c, d
Alastair Frew	Drax Generation Enterprise Ltd	WAGCM2	c, d
Garth Graham	SSE Generation	WAGCM1	d
Tony Johnson	ESO	Original	a, b, c, and d

			(But in particular d)
Julie Richmond /Priyanka Mohapatra (Alternate)	Scottish Power Renewables (UK) Limited	WAGCM2	d
Graeme Vincent	SP Energy Networks	WAGCM1	a, c, d
Richard Wilson/Bill D 'Albertson (Alternate)	UK Power Networks	WAGCM1	a, c, d

Of the 7 votes, how many voters said that this option was better than the Baseline.

Option	Number of voters that voted this option as better than the Baseline
Original	7
WAGCM1	6
WAGCM2	7