

# STC Modification Panel Minutes: 28 September 2022

## STC Modification Panel Minutes: Meeting Number 204

**Date:** 28 September 2022      **Location:** Microsoft Teams

**Start:** 10:00am      **End:** 11:40am

### Participants

Attendee	Initials	Company
Sally Musaka	SM	Chair, Code Administrator, National Grid Electricity System Operator (NGESO)
Rashpal Gata-Aura	RGA	Tech Sec, Code Administrator, National Grid Electricity System Operator (NGESO)
Catia Ariana Carvalho Gomes	CCG	Code Administrator, National Grid Electricity System Operator (NGESO) (Observer)
Rob Wilson	RWI	National Grid Electricity System Operator (NGESO)
Jamie Webb	JW	National Grid Electricity System Operator (NGESO) (New ESO Panel Representative - taking over from Rob Wilson)
David Halford	DH	National Grid Electricity System Operator (NGESO)
Antony Johnson	AJ	National Grid Electricity System Operator (NGESO)
Terry Baldwin	TB	National Grid Electricity System Operator (NGESO)
Nicola Bruce	NB	National Grid Electricity System Operator (NGESO)
Keith Jones	KJ	National Grid Electricity System Operator (NGESO)
Neil Sandison	NS	Scottish Hydro Electric Transmission plc. (SHET)
Michelle MacDonald	MMac	Scottish Hydro Electric Transmission plc. (SHET) (Alternate for NB)
Richard Woodward	RWO	National Grid Electricity Transmission (NGET)

Ian Bottomer	IB	National Grid Electricity Transmission (NGET)
Milorad Dobrijevic	MD	Scottish Power Transmission plc. (SPT)
Mike Lee	ML	Offshore Transmission Owner (OFTO)
Nadir Hafeez	NH	Ofgem
<b>Apologies</b>	<b>Initials</b>	<b>Company</b>
Joel Matthews	JM	Offshore Transmission Owner (OFTO)
Neil Bennett	NB	Scottish Hydro Electric Transmission plc. (SHET)

### 1. Introductions and Apologies for Absence

- 6025. Apologies were received from Joel Matthews and Neil Bennett.
- 6026. The Chair introduced Jamie Webb as the new ESO Panel Representative, taking over from Rob Wilson.

### 2. Approval of Minutes from Previous Meeting

- 6027. The Panel approved the minutes from the meetings held on 28 July 2022 and 31 August 2022 . (**Post Panel note:** The minutes are now available on the National Grid ESO website [July 2022](#) and [August 2022](#)).

### 3. Review of Actions

- 6028. The Panel reviewed the open actions from the meeting held on 31 August 2022 which can be found on the [Actions Log](#) within the Panel Papers.
- 6029. RWI confirmed and the Panel agreed that action **5936** had been concluded and could be closed off. Since the planned meeting to discuss the way in which MRPL was instructed and had agreed that the STCP01-1 that allows electronic instruction was not in dispute, however, how an electronic instruction is implemented remains an area for further discussion.
- 6030. RWI advised the Panel that MRPL have agreed with the ESO that they should be instructed verbally to carry out switching via their control point as is standard practice.
- 6031. **ACTION** Panel to discuss how an electronic switching instruction should be implemented to maintain the necessary checks under the appropriate safety rules while considering possible efficiencies.

### 4. Authority Decisions

- 6032. The Chair informed the Panel there was no new Authority decisions on STC modifications.
- 6033. NH affirmed that the decision date on **CM078 “Connections Triggering Distribution Impact Assessment”** remains on 30 November 2022.
- 6034. NH advised the Panel that Ofgem were publishing the ongoing Code Governance Reform review in October seeking views to Code Consolidation/Code Manager Licence

Conditions/Stakeholder Advisory Forum to provide some further information to their approach to implementation.

- 6035. NH advised the Panel that there had been a meeting in September 2022 with the Panel Chairs to discuss the aspects of Code Governance Reforms and a meeting with Code Administrators. The key message from Ofgem was to await publication of Call for inputs in October 2022.
- 6036. RW questioned if Ofgem were considering hosting stakeholder workshops as previously in relation to ECR consultation, or merely requesting responses to the consultation.
- 6037. NH responded that there was no update on SCR and Energy Code Review and no workshops were envisaged. This was more of a request for corporate input and Ofgem were hoping that by talking to Code Administrators and the Panel Chairs for information and for that to be then circulated/distributed.
- 6038. NH advised the Panel that this update has now been provided and Ofgem were slightly behind schedule.

## 5. STC/STCP Modification Proposals for Panel Decision

- 6039. The Chair advised the Panel that two new modifications had been received for September 2022 Panel and invited the Proposer to present.
- 6040. RWI delivered the presentation on **CM085 – “To Clarify OFTO reactive power requirements at <20% output.”**.
- 6041. RWI advised the Panel that **CM085** had been presented in **draft** at June 2022 Panel. It was **formally** raised at July 2022 Panel and was now being presented back to Panel with minor amendments incorporated following the discussions at July 2022 Panel. For more details please see the **CM085** proposal within the [Panel Papers](#).
- 6042. RWI advised that it was unclear what the requirements are on OFTOs to provide access to reactive power capability at low windfarm outputs. **CM085** seeks to clarify where reactive capability is available it should be provided which is operationally useful to the ESO.
- 6043. RWI advised the Panel that following discussions with the OFTOs, minor changes had been made to the legal text to provide more clarity and comfort in terms of the assurance, that an acceptable opt-out of this would be that ESO would be operating equipment in a way that would cause it to have a shortened lifespan or would be detrimental to it. It was not a design requirement to have reactive capability at <20% output.
- 6044. The ask of the Panel was to agree that **CM085** met the Self-Governance Criteria, proceed to Code Administrator Consultation and note the proposed timeline.
- 6045. The Panel members all agreed that **CM085** did not meet the Self-Governance criteria however, it should follow the Standard Governance route (with no workgroup required) and should proceed straight to Code Administrator Consultation. The Final Modification Report will be submitted to Ofgem for a decision.
- 6046. ML raised a concern that the OFTOs’ concerns were that the increased operation of the SVCs at low windfarm outputs would make them less reliable (as they were working hardest in those circumstances anyway). Currently Section K drafting is unclear as to whether full compliance is a requirement in operational timescales too.

There have been occasions when the ESO Control Room have taken a literal view of the STC and suggested that the OFTO system could not operate or be restricted if it wasn't compliant with Sec K (when there have been SVC failures / outages), although this has always been resisted by the OFTO and a compromise reached.

6047. ML stated that in 2013, OFTOs sought guidance from the STC committee with regards to how compliance in operational timescales should be treated and there was strong support that it wasn't an operational standard, however, this anomaly was still there.
6048. ML advised that whilst OFTOs support the **CM085** amendment, their ask was to also address this anomaly about the section K requirements for reactive power/voltage control not being mandatory in operational timescales and each issue being addressed on its merits in meeting SQSS compliance, as it would be with any TO's reactive compensation equipment.
6049. RWI proposed that whilst this anomaly could not be addressed in the legal text for **CM085**, reassurance could be provided about it in the narrative. As this was a change to the core STC, **CM085** modification would need to be submitted to Ofgem for a decision and if Ofgem felt it was more appropriate, more guidance could be given by them, particularly if that guidance was then included in the Final Modification Report.
6050. RWI proposed that **CM085** should proceed to Code Administrator Consultation and suggested that all the concerns should be put in the consultation responses. These concerns can then be discussed, addressed and included in the Final Modification Report but would not be submitted to Ofgem until the Panel were comfortable that the concerns had been properly addressed.
6051. RWI advised the Panel that **CM085** was not seeking to prompt further investment in new equipment, this modification merely seeks to clarify how the equipment was operated which was already in place.
6052. RWI advised the Panel that if it was felt there was a need to check if the existing equipment was right at <20%, then that would be a different/another modification, **CM085** was merely clarifying the equipment that was already in existence.
6053. RWI re-iterated that all concerns should to be raised in the Code Administration Consultation responses and the Panel can address these before the Final Modification Report is issued to Ofgem.
6054. The Chair advised the Panel that the next steps were for **CM085** to proceed to Code Administrator Consultation and note the timeline. The Code Administrator Consultation was for the Panel members and industry to submit all their concerns which will be commented on and shared.
6055. **ACTION** Code Administrator to issue the Code Administrator Consultation on 05 October 2022 to 26 October 2022 (**Post Panel note: CM085** Code Administrator Consultation issued on 5 October 2022).
5961. The Chair advised the Panel **PM0127 – “Changes to STCPs required to facilitate CUSC modifications CMP286/287 – “Improving TNUoS Predictability through increased notice of the Target Revenue and Inputs used in the TNUoS Tariff Setting Process”** was presented as a **draft** at the August 2022 Panel and was now being **formally** raised to the September 2022 Panel. For further details on **PM0127** please see the slides within the September 2022 [Panel Papers](#).

- 6056. The ask of the Panel was to **Agree** and **Approve** the STCP changes ‘**in Principle**’.
- 6057. Some Panel members raised concerns and the Proposer (DH) confirmed that this STCP change would only be implemented on the back of the **CUSC modifications CMP286/287** being approved by Ofgem.
- 6058. DH advised the Panel that ultimately whilst **CMP286/287** is driving this modification, it has been recognised at an early stage to be prepared with the STCP changes should the CUSC modifications be approved.
- 6059. The Panel members unanimously approved the STCP changes “**in Principle**” pending decision from the Authority on **CMP286/287**.

## 6. Draft STC/STCP Modifications

- 6060. The Chair advised the Panel that no draft modifications had been submitted to September 2022 Panel.

## 7. Inflight Modification Progress

- 6061. The Chair summarised the **CM080 Draft Final Modification Report** providing a summary of 1<sup>st</sup> and 2<sup>nd</sup> Code Administrator Consultation Responses, full details can be found within the slides in [Panel Papers for August 2022](#).
- 6062. RWI apologised to the Panel regarding **PM0126 (the STCP change)** which was due to be presented at the September Panel.
- 6063. RWI advised the Panel that work on **PM0126** was almost complete and there was a meeting planned for 5 October 2022 to conclude this modification.
- 6064. RWI indicated that the intention was for **PM0126** to be presented at the October 2022 Panel and it is important that **CM080** Final Modification Report is submitted to Ofgem on time so that it does not impact the decision on the CUSC modification which Ofgem were planning to give a decision on at the end of November 2022.
- 6065. RWI confirmed that **PM0126** will be presented to the October 2022 Panel.
- 6066. RW advised the Panel that whilst the TOs were happy to vote on **CM080**, a suggestion was that some learning should be taken from this process. **PM0127** which was voted on earlier was a good example of best practice to be applied to future changes where STC and STCPs which are a consequence of a cross code impact at the same time.
- 6067. RW advised that part of the process might be improved by **CM084** with consideration at the start regarding why Ofgem are not interested in the STCP changes when the TOs are unanimous that these changes are potentially material and/or have a significant bearing on their ability to make decisions on the STC changes and that the process could be better.
- 6068. RW indicated that **CM084** was looking to address this issue, improve the process and wanted to put this on record whilst noting the hard work carried out . It was also noted that there was a constraint or dependency on the CUSC side ensuring this does not hold up the CUSC modification unnecessarily.
- 6069. RW advised the Panel that whilst appreciating the hard work undertaken , however in future when modifications are initiated there needs to be more transparency and a

clearer view from the Panel perspective whether the STCP changes should or should not be part of the consideration.

- 6070. The Chair invited the Panel to **VOTE** on **CM080** and note the ongoing timeline.
- 6071. The Panel unanimously approved **CM080** with Draft Final Modification Report to be issued to Panel on 30 September 2022 to check their votes had been recorded correctly.
- 6072. The Chair advised the Panel that the Final Modification Report will be submitted to Ofgem on the 11 October 2022 with the implementation date 10 working days following Authority decision in line with the CUSC modification.

## 8. Code Administrator Update

- 6073. No Update.

## 9. Potential Future Modifications

### Modification Tracker and Horizon Scan

- 6074. The Panel reviewed the STC Modification Tracker. The amendments to this tracker can be found within the [Panel Papers](#).

### Authority Update

- 6075. NH advised the Panel that there had been an update on the Access SCR received from their charging team, that the deadline for DCUSA Change Proposals had been extended. This was to give prospective working groups more time to work solutions for the DCUSA Access SCR enabling modifications, expecting the DCUSA reports to go to Panel on the 19 October 2022 with final change declarations submitted to Ofgem on 3 November 2022.

## 10. Reports from Sub- Committees

### Joint Planning Committee – JPC

- 6076. The next JPC meeting TBC.

### Network Access Policy Workgroup – NAP

- 6077. MD advised the Panel that the NAP meeting was held on 14 September 2022 where good discussions took place on the first year of ODI (Output Delivery Incentives) associated with STCP 11.4. From the discussions and review of the outputs from year 1 of the trial, few actions emerged which were being progressed.
- 6078. The next meeting was scheduled for early December 2022.
- 6079. RW commented on the Connections Reforms journey that the ESO are involved in and indicated that it would be beneficial to have a high level insight to the potential updates which may be needed to the STCs to facilitate the Connections Reform.

6080. RW indicated that he would be willing to provide input, however, the Panel should anticipate STC modifications being brought forward to try and improve efficiency with customers connections, given the volume of applications and congestions in queues being managed presently.
6081. RWI advised the Panel that he would have a conversation with the team co-ordinating Connections Reform to request attendance at a future Panel to give an overview. This would be useful in the first instance as it would help to inform the timescale for any work being taken forward regarding any STCP changes that are envisaged at present.
6082. **ACTION** RWI to approach the co-ordinator of Connections Reform to attend one of the future STC Panels to provide an overview.

### 11. Any other Business

6083. AJ gave a high level presentation on **GC0148 “Emergency and Restoration Code – Phase II”** highlighting the objectives:-
- Address those Articles of EU Emergency and Restoration Code (E&R) which have a Compliance Deadline of 18<sup>th</sup> December 2022
  - Art 15(5) – 15(8) – Low Frequency Demand Disconnection
  - Art 41 – Communications Systems
  - Art 42 (1)(2) and (5) – Critical Tools and Facilities
  - Address the outstanding issues of E&R Phase I introduced in 2019
  - The Treatment of Electricity Storage Modules during low System frequencies
  - How non CUSC parties fall under the remit of E&R
  - Consider the introduction or otherwise of Distributed Re-Start
6084. AJ advised the Panel on the current situation which was that the Distributed Re-Start and associated work (e.g. Contracts) had been removed from the GC0148 work and moved into the GC0156 modification. Workgroup Consultation was held between 28 March and 27 April 2022 and following the Workgroup Consultation two WAGM’s were introduced to reflect System State. The Legal Text was reviewed on 28 May 2022 and again on 11 July 2022 following identification of an error in the baseline legal text.
6085. AJ advised the that the Grid Code Review Panel (GCRP) voted in favour of the modification at July 2022 meeting and the Code Administrator Consultation was held from 3 August 2022 – 5 September 2022 – two responses were received both in favour of the modification. The issue was to be presented to the September GCRP when it was expected it would then be submitted to Ofgem for Decision.
6086. AJ stated that the Panel should be aware of the changes introduced through Grid Code modification GC0148; most of the changes applied to Grid Code User’s though some (e.g. Critical Tools and Facilities) will apply to Transmission Licensees. The ESO would undertake a review of the STC and STCP’s to ensure consistency with the GC0148 changes and raise the necessary STC / STCP modifications to reflect these. An update would be provided at the STC October 2022 Panel Meeting.

6087. The Chair reminded the Panel that at the August 2022 Panel meeting Panel members were requested to consider providing some dates for a face to face STC Panel meeting.
6088. The Panel members agreed for the October 2022 Panel meeting to be held face to face in Warwick
6089. **ACTION** Panel Secretary to make appropriate arrangements for October 2022 meeting to be held face to face and related information to be circulated to Panel members.
6090. RWI flagged to the Panel a potential issue which should be considered - **GC0103** “*The introduction of harmonised Applicable Electrical Standards in Gb to ensure compliance with the EU Connection Codes*”. This modification was raised by SSE Generation 21 July 2017 and had been prioritised to the bottom of the stack. **GC0103** modification was seeking to harmonise the Electrical Standards owned by the TOs so there was just one set that applies to all users across GB.
6091. RWI advised the Panel that **GC0103** had not been progressed for some time and indications now were that this modification would be getting more focus as the CATO work progressed.
6092. RWI suggested that consideration be given now to the position of the STC ahead of **GC0103** being moved up the agenda on the Grid Code Panel as was anticipated.
6093. RWI advised the Panel the other item progressing under the Grid Code Panel was that SHET were reviewing their interface documents which describes the differences between NGET Relevant Electrical Standards (RES) standards and the standards that would apply in the SHET area. This was linked to **GC0103** being placed on hold and would have been encompassed in that modification, however this was the reason it had slipped.
6094. RWI stated that following recent discussions with NGET, it was confirmed that their RES documents were up to date but they had internal and external versions. Whilst some of their internal standards had been updated the external version had not been updated recently hence a reflection of emerging issues under the Grid Code and for the STC Panel to be proactive to this.
6095. RWI advised the Panel of his move to the FSO and thanked all for their support.
6096. RWI advised that Early Competition workshop had been re-arranged from the 6 to 10 October 2022. This workshop would be held virtually from 13:00pm to 16:00pm Panel members could sign up using [this link](#) and for more information to contact [Gareth Stanley](#) at Nationalgrid ESO.
6097. The Chair closed the meeting reminding Panel members of the October 2022 STC Panel meeting dates as below.

### Date of next meeting

6098. The next STC Panel meeting will be held on **Wednesday 26 October 2022**
6099. New Modification Proposal date **Tuesday 11 October 2022**
6100. Panel papers day **Tuesday 18 October 2022**