

Grid Code Review Panel

29 September 2022

Grid Code Review Panel Minutes

Date: 29/09/2022 **Location:** Microsoft Teams
Start: 10:00am **End:** 12:00am

Participants

Attendee	Initials	Company
Trisha McAuley	TM	Independent Panel Chair
Milly Lewis	ML	Code Administrator Representative
Shazia Akhtar	SA	Panel Technical Secretary, Code Administrator
Alan Creighton	AC	Panel Member, Network Operator Representative
Alastair Frew	AF	Panel Member, Generator Representative
Christopher Smith	CS	Panel Member, Offshore Transmission Operator Representative
Graeme Vincent	GV	Alternate, Network Operator Representative
Gurpal Singh	GS	Authority Representative
John Harrower	JH	Panel Member, Generator Representative
Nadir Hafeez	NH	Authority Representative
Nick Rubin	NR	Panel Member, BSC Panel Representative
Robert Longden	RL	Panel Member, Supplier Representative
Rob Wilson	RWi	Panel Member, National Grid ESO
Roddy Wilson	RW	Panel Member, Onshore Transmission Operator Representative
Sigrid Bolik	SB	Panel Member, Generator Representative

Apologies

Attendee	Initials	Company
Guy Nicholson	GN	Panel Member, Generator Representative
Steve Cox	SC	Panel Member, Network Operator Representative

Presenters / Observers

Attendee	Initials	Company
Alastair Grey	AG	National Grid ESO (Co-presenting new Modification GC0158)
Banke John-Okwesa	BJO	Code Administrator, ESO
Garth Graham	GG	SSE (Presenting new Modification GC0160)
Iain Dallas	ID	Alternate, Generator Representative
Jamie Webb	JW	National Grid ESO
Jessica Rivalland	JR	Code Administrator, ESO
Rashmi Radhakrishnan	RR	Elexon
Stephen Baker	SBa	National Grid ESO (Co-presenting new Modification GC0158)

1. Introductions and Apologies

9157. Apologies were received from Guy Nicholson and Steve Cox.

9158. The Chair advised that this is NR and BJO's last Panel and that RR and SA would be taking over as the BSC Panel Representative and Grid Code Review Panel Secretary. The Chair thanked them both for all their work, contribution and support on the Panel.

9159. The Chair reminded Panel Members of the requirement for impartiality and of declaring potential or perceived conflicts of interest. No declarations were received from Panel Members.

2. Minutes from previous meeting

9160. The meeting minutes from the Grid Code Review Panel held on 25 August 2022 were approved subject to the incorporation of amendments requested by NH and RL.

3. Review of actions log

9161. The Panel agreed to close Action **428**.

4. Chair's update

9162. There were no Chair updates.

5. Authority Decisions

9163. GS advised that, due to the complexity of [GC0141](#) they were not expecting to reach a decision on this until the first week of November 2022.

6. New Modifications

[GC0159 - Introducing Competitively Appointed Transmission Owners](#)

9164. Stephen Baker (SBa) and Alastair Grey (AG) from National Grid ESO delivered a presentation on GC0159. This seeks to introduce the concept of Competitively Appointed Transmission Owners (CATOs) into the Grid Code to enable Onshore Network Competition for the design, build and ownership of Onshore Transmission assets.

9165. AF and RW highlighted that this modification assumes that the Energy Security Bill will be enacted into law and that CATOs will be granted a Transmission Licence and categorised as Onshore Transmission Licensees.

9166. RWi acknowledged the risk around the assumption being made on the legislation but explained that the modification was being raised now to give the ESO enough lead time to get the work done.

9167. RL stated that the debate around what classifies as a small, medium and large power station has been discussed for a very long time. It is interesting to note that CATOs will trigger another review of this.

9168. AG explained that these discussions will be within the context of the work that is already going on in this area.

9169. RW questioned why the Grid Code timelines were ahead of CUSC, STC and the SQSS.

9170. SBa explained that the CATO modifications for the CUSC, STC and SQSS would be raised later this year. The Grid Code modification had been raised first because the ESO believed that the changes were more clerical in nature and that the STC and CUSC will predominantly require the most work. SBa highlighted that the Workgroups will run concurrently so that any cross-code impacts identified between the codes will be picked up.

9171. RWi explained that all four Final Modification Reports (FMRs) will be submitted to Ofgem at the same time in October 2023. The ESO is also expecting that this is when the Energy Security Bill will receive Royal Assent.

9172. Several Workgroup members highlighted interactions with the Grid Code modifications: [GC0103](#), [GC0117](#) and [GC0156](#). AF advised that the GC0156 timeline was currently ahead of GC0159 and that the GC0156 Workgroup needed to take CATOs into consideration before concluding their Workgroup discussions.

9173. SBa explained that the ESO were already working very closely with the Proposer of GC0156 to make sure that they look at any inter-dependencies and interactions across the two modifications.

9174. NR questioned why there was no reference to the BSC. NR explained that, even though the BSC did not refer to transmission operators or owners, it did refer to transmission systems and there may be BSC implications.

9175. AG explained that the ESO were already engaging with Elexon to validate assumptions and identify where consequential modifications may need to be raised. They will continue

to do this and welcome any further input via Workgroups to help identify any gaps in their analysis.

9176. GV stated that in his view the Grid Code changes were more than just clerical in nature and that the ESO should not underestimate the work that may be required. GV also highlighted that conversations on CATOs had already begun within the GC0156 sub-Workgroup.

9177. The Panel unanimously concluded that the Modification should follow the Standard Governance procedure and requested two additional specific Terms of Reference (ToR). The Panel requested that the GC0159 Workgroup considers interactions with the existing modifications GC0103, GC0117 and GC0156 and that the timeline for the four CATO modifications are aligned to help identify and pick up any cross-code impacts.

[GC0160 - Grid Code Changes for BSC Mod P448: "Protecting Generators subject to Firm Load Shedding during a Gas Supply Emergency from excessive Imbalance Charges"](#)

9178. The Chair noted that the Panel had received a request for GC0160 to be treated as an urgent Grid Code Modification.

9179. Garth Graham (GG) from SSE delivered a presentation on GC0160. GG explained that the BSC Modification [P448](#) proposes to address the risk of Generators in GB being prevented from generating this winter (due to Firm Load Shedding during a Gas Supply Emergency) by allowing such Firm Load Shedding instructions to be settled as Bids. As a result, and in order to ensure consistency between the Balancing and Settlement Code (BSC) and the Grid Code, GC0160 seeks to ensure that the actions of the affected party in terms of Physical Notifications are aligned. GG stated in his view GC0160 met [Ofgem's urgency criteria \(a\) and \(b\)](#).

9180. AF questioned whether the modification was needed and did not feel any thing needed to be done to the Physical Notifications (PNs).

9181. GG explained that GC0160 was raised after engagement with the Electricity National Control Centre (ENCC). If, during Workgroup discussions, it turns out that the modification is not needed, then it will be withdrawn.

9182. CS noted that an electricity interconnector could be curtailed from exporting electricity to protect gas supplies before gas generators are curtailed. CS felt that this modification should therefore apply to all Users who are materially affected by this, not just gas Generators. CS also felt that this modification should be time-bound so that it is not an open underwriting of business risks.

9183. GG stated that this was not within the scope of GC0160, which dealt with a gas deficit instruction which can only be given by the Gas System Operator (GSO) or the Network Emergency Co-ordinator (NEC) to a gas generator. GG advised that a separate modification would need to be raised to look at electricity interruption arrangements.

9184. RL agreed with CS that, if the system is under stress, a prudent gas/electricity system operator may decide to curtail exports of electricity in order to ensure the system is stable before curtailing gas. RL also agreed with GG that this was not within the scope of GC0160 but felt it was something somebody needed to think about.

9185. RWi questioned what motivation a User may have to reduce their PN if they can remain held whole during a gas deficit. As PNs submitted by a gas fired generator shall throughout the gas interruption reflect the expected output of the unit as at the time just prior to the start of the gas interruption and will not be exposed to imbalance prices.

9186. GG explained that the User would have to supply evidence to the post deficit validation committee to show that they acted in the best interest of everyone. Failing to do this may affect the financials agreed by the committee.
9187. AF stated that PNs were an operating number used by the ESO and struggled to understand how they fitted into balancing, settlements or the money side of things.
9188. GG explained that bowers flow on from PNs which then impact balancing and settlement and that the ENCC also advised that this Grid Code change was needed.
9189. Due to the overlapping nature of the modifications and industry resource the Panel recommended that a joint BSC/Grid Code Workgroup should be established.
9190. ML confirmed that joint Workgroups were being planned and that they had aligned their timeline to the BSC modification as much as possible given the different governance arrangements.
9191. GG acknowledged that there may be impacts on the Electricity Balancing Regulation (EBR) Article 18 terms and conditions which could mean that a 1-month Code Administrator Consultation may be required.
9192. ML confirmed that, if during Workgroup discussions it appears that no regulated sections are impacted, then the length of the Code Administrator Consultation may be reduced to align this with the BSC timeline.
9193. The Panel unanimously agreed that GC0160 met the urgency criteria and should follow the urgent timeline produced by the Code Administrator and proceed to a joint Workgroup.
9157. RWi suggested that the Code Administrators should submit a single request for urgency to Ofgem.

Post Panel Note: As the BSC Panel discussions on P448 did not take place until a lot later that day, the requests for urgency were sent separately but with aligned timelines and joint Workgroups.

9158. The Panel requested one additional specific ToR which was to ensure alignment with the BSC P448 solution through joint Workgroups.
9159. The Panel did not feel that an additional ToR was needed for the concerns raised by Panel members on PNs as this was an integral part of the modification and would be discussed by the Workgroup. RWi stated that the concerns would be passed on to the ESO representative who would be attending the BSC Panel to make sure they were aware of this.
9160. NR advised that he would feedback their discussions on this to Elexon and suggested GG could raise this later on at the BSC Panel as well.
9161. AC stated that due to the Panel's lack of familiarity in this area, it would be good if someone provide some slides explaining how PNs work and fit into the broader picture.

Post Panel Note: GG will be presenting some slides on this at the next special Grid Code Review Panel on the 18 October 2022.

9162. RL suggested that Panel Members could help out if their issues around quoracy on the Workgroup and advised that the requests for nominations should be to join both Workgroups.

7. In flight modification updates

9163. ML talked the Panel through the progression of the in-flight modifications. The in-flight modifications can be found in the Headline Report within the Grid Code Review

Panel papers pack on the National Grid ESO website via the following link:

<https://www.nationalgrideso.com/document/268016/download>

GC0139: Enhanced Planning-Data Exchange to Facilitate Whole System Planning

9164. ML advised that a check-in meeting is scheduled for the 04 October, where the legal text subgroup will update the workgroup on their progress. This will then come back to the October Panel if an additional timeline extension is needed.

GC0154 Incorporation of interconnector ramping requirements into the Grid Code as per SOGL

9165. ML highlighted that there have been further delays to the publishing of the tender for the Cost Benefit Analysis (CBA). Ofgem have provided some feedback on the tender questions and these suggestions are now being worked into the tender documentation before it is sent out. The next Workgroup is planned for the 06 October and a revised timeline will be provided to the Panel as soon as it is available.

8. Prioritisation Stack / Dashboard

9166. The Panel reviewed the prioritisation stack. The Chair highlighted that GC0160 would automatically go to the top of the stack if it was granted urgency, but if this was declined the Panel could re-prioritise it next month. The Panel discussed GC0159 and agreed that it should go below GC0155, based on timescales for implementation. No further changes were made.

9167. The updated Prioritisation Stack can be found in the Headline Report via the following link:

<https://www.nationalgrideso.com/document/268016/download>

9. Workgroup Reports

9168. There were no Workgroup Reports presented to the Panel.

10. Draft Final Modification Reports

GC0148: Implementation of EU Emergency and Restoration Code Phase II

9169. ML explained that this modification will implement the remaining articles under the Network code on Electricity Emergency and Restoration (NCER).

9170. ML advised that the Code Administrator Consultation opened on the 03 August 2022, closed on the 05 September 2022, and received 2 non-confidential responses. No legal text issues were identified.

9171. The Panel held their determination vote and unanimously agreed that the Original and WAGCM2, and by majority WAGCM1 better facilitated the Grid Code Objectives than the baseline. The Panel also recommended by majority (6 out of 9 votes) that WAGCM1 is the best option, although support was also expressed for WAGCM2 (2 votes) and the Original proposal (1 vote).

Post Panel Note: The GC0148 Final Modification Report was circulated to Panel on 4 October 2022 to check their vote. This was then sent to Ofgem on the 12 October 2022, with a request for a decision by the 2 December 2022.

11. Reports to Authority

9172. There were no updates for the Panel.

12. Implementation updates

9173. There were no updates for the Panel.

13. Governance

9174. There were no updates for the Panel.

14. Grid Code Development Forum (GCDF)

9175. RWi advised that the last meeting was held 07 September 2022 and covered the following items:

- Update on [CMP376](#), which is seeking to formally introduce improvements to the Queue Management Process as developed through the ENA Open Networks project.
- Update on the Workstream for Early Competition; and an
- Update on Digitalising the Whole System Technical Code Project.

9176. The next GCDF was scheduled for the 05 October 2022 but has now been cancelled due to the lack of agenda items.

9177. RWi stated that, after 10 years on the Panel, this will be his last meeting as he will be moving roles within the ESO to a new team that will be dealing with the FSO transition. RWi stated that he has really enjoyed his time on the Panel.

9178. The Panel expressed their sincere thanks to RWi for the phenomenal amount of work he has done on the Panel. The Panel stated that they will sincerely miss RWi's wealth of experience, knowledge, helpful and informative contribution on the Panel, as well as his gentlemanly and patient approach in extremely challenging situations. The Chair wished RWi the best of luck in his new role.

9179. RWi introduced Jamie Webb and explained that he would be taking over as the ESO Panel Member going forward.

9180. JW stated that he was looking forward to getting to know them all over the coming months and years. JW explained that he has worked in the Codes arena for the last four years, largely on the BSC, CUSC and European post Brexit frameworks and this was the first time he is working on the Grid Code.

9181. The Panel welcomed JW to the Panel.

15. Standing Groups

Distribution Code Review Panel Update

9182. No updates for Panel.

Joint European Stakeholder Group (JESG)

9183. No updates for Panel.

16. Updates on other Industry Codes

9184. NR advised that Elexon are doing some modelling on short- and long-term scenarios as part of their winter readiness to make sure they are prepared for anything that may come

over the winter. NR questioned whether National Grid ESO were doing something similar and if there were opportunities for them to join forces on some of this work.

9185. RL highlighted that the ESO publish their Winter Outlook every year.

9186. ML shared this link to the ESO Winter Outlook:

<https://www.nationalgrideso.com/document/268346/download>

17. Blockers to Modification progress

9187. There were no updates at this Panel meeting.

18. Horizon Scan

9188. There were no updates at this Panel meeting.

19. Electrical Standards

9189. There were no updates for the Panel.

20. Forward Plan Update / Customer Journey

9190. There were no updates at this Panel meeting.

21. Any Other Business (AOB)

2023 Grid Code Review Panel Dates

9191. ML confirmed the 2023 Grid Code Review Panel dates and stated that these would be going onto the website and into people's calendars shortly.

Update on Grid Code Review Panel Elections

9192. ML provided an update on the Grid Code Review Panels Elections and reminded Panel Members that the nominations window closes at 5pm on Friday 30 September 2022.

Update – Code Governance Reform

9193. NH advised that they are planning to publish a "Call for Input" in October 2022. This will seek views on Code Consolidation, Code Manager License Conditions and the Stakeholder Advisory Forum, as well as providing information on their implementation approach.

The next Grid Code Review Panel meeting will be held on 27 October 2022. This will be in Faraday House as well as via Microsoft Teams.

Post Panel Note: ML sent out a form requesting that Panel Members confirm whether they will be attending in person or not.

New Modification Proposals are to be submitted by 12 October 2022.

Grid Code Review Panel Papers Day is 19 October 2022.