

Grid Code Review Panel

24 November 2022

Grid Code Review Panel Minutes

Date: 24/11/2022	Location: Microsoft Teams
Start: 10:00 AM	End: 12:00 PM

Participants

Attendee	Initials	Representing
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
Guy Nicholson	GN	Panel Member, Generator Representative
Jamie Webb	JW	Panel Member, National Grid ESO
John Harrower	JH	Panel Member, Generator Representative
Nadir Hafeez	NH	Authority Representative
Rashmi Radhakrishnan	RR	Panel Member, BSC Representative
Robert Longden	RL	Panel Member, Supplier Representative
Roddy Wilson	RW	Panel Member, Onshore Transmission Operator Representative
Sigrid Bolik	SB	Panel Member, Generator Representative

Apologies

Attendee	Initials	Representing
Steve Cox	SC	Panel Member, Network Operator Representative

Presenters / Observers

Attendee	Initials	
Bryan Rhodes	BR	Offshore Transmission Operator Representative
Iain Dallas	ID	Generator Representative
Frank Kasibante	FK	National Grid ESO (Presenting on Digitalised Whole System Technical Code Update)

1. Introductions and Apologies

9244. Apologies were received from Steve Cox.

9245. 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 meetings

9246. The minutes from the Special Grid Code Review Panel held on 18 October 2022 were approved, along with the minutes for the Grid Code Panel held on 27 October 2022 (subject to the incorporation of minor amendments requested by AC).

3. Review of actions log

9247. The Panel agreed to close Action **429**.

Post Panel Note: Code Admin sent out a Poll on the 07/12/22 to the new 2023-24 Grid Code Review Panel Members, to try and establish how many individuals were interested in getting together for a pre-panel dinner the evening before the January 2023 Panel and where they would like to go.

4. Chair's update

9248. There were no Chair updates.

5. Authority Decisions

9225. GS advised that Ofgem were expecting to publish a decision on [GC0141](#) during week commencing 5 December 2022. In relation to [GC0148](#), the ESO had recently highlighted that Aggregators would become non-compliant with the Grid Code if this modification was implemented as currently drafted. As this issue has only recently been identified and it was not picked up as part of the Workgroup discussions or Consultation responses, Ofgem are not currently able to provide any further details on this or the impact this may have on the decision date or the decision itself. Ofgem's Policy Team are considering all the options and are aware of the deadline for compliance (18 December 2022).

9226. JW confirmed that the ESO had spoken to Ofgem and BEIS about the retained piece of EU law which possibly captured Aggregators and would result in them being non-compliant after the EU code implementation date of 18 December 2022. The ESO suggested two possible ways forward: 1) Ofgem sends back [GC0148](#), requests that Virtual Lead Parties (VLP), which includes Aggregators, are removed from the legal text, and that a short consultation is held (if required). Along with requesting that a wider issue group be set up across all the codes to look at how VLP are treated in general, and what should/ should not apply to them. 2) Given the tight deadline for compliance, Ofgem, if they see fit could approve the modification as drafted and ask that VLPs request a derogation from this aspect of the Grid Code / EU Network Code.

9227. NH explained that Ofgem may not have the authority to request that the legal text be amended, as they have to operate within the rules of the Grid Code. They are also restricted by the very tight timeline for compliance, given that this issue has been raised quite late in the process.
9228. ML explained that the issue was only recently identified during [GC0156](#) Workgroup discussions and it was highlighted to Ofgem and BEIS as soon as they were made aware of it. ML advised that, if GC0148 is sent back, it is very unlikely that any Grid Code changes could be developed and approved before the compliance deadline, as this is just over 3 weeks away. The only practical way that this issue can be addressed is if the modification is approved and VLPs apply for derogations.
9229. AC highlighted that applying for a derogation was quite a lengthy process and questioned whether Ofgem would consider making the process less prescriptive for VLPs on this occasion. AC also noted that VLP and Aggregators may not even realise that they may need to apply for a derogation.
9230. GS agreed that it can take Ofgem several months to reach a decision on derogations and that they would need to look into whether the process could be made less prescriptive on this occasion.
9231. AF explained that, once parties have applied for a derogation, they are exempt from doing anything until Ofgem reach a decision on the derogation.
9232. RL questioned what learning points had come out from this to prevent this issue happening again.
9233. JW explained that the main lesson that they had been learnt was that VLP/aggregators were not represented on the [GC0148](#) Workgroup. Going forward, the requirement for VLP/aggregators representation will be reviewed ahead of Workgroups commencing.
9234. ML advised they have also added a specific reference to VLPs onto the Modification Proposal form and, if they are not required on Workgroups, a sense check will still be carried out to make sure that is correct.
9235. GS noted that another learning point was that extra time needed to be built into compliance modification timelines, so that there was ample time at the end of the process for send backs if required, to avoid parties having to request derogations for no fault of their own.
9236. ML questioned whether GS or NH knew when Ofgem would be reaching a decision on [GC0160](#).
9237. NH advised that Ofgem will be reaching a decision on [P448](#) and [GC0160](#) together in the first week of December 2022.
9238. GC advised that Ofgem's publishing moratorium will begin at 2.30pm on Thursday 15 December 2022 and that normal publishing will resume at 9am on Wednesday 4 January 2023.

6. New Modifications

9239. No new modifications proposals were presented to the Panel.

7. In flight modification updates

9240. ML talked the Panel through the progression of the in-flight modifications. The modification tracker can be found within the Grid Code Review Panel papers pack on the National Grid ESO website via the following link:

<https://www.nationalgrideso.com/document/271271/download>

[GC0155: Clarification of Fault Ride Through Technical Requirements](#)

ESO

9241. ML advised that the ESO SME Team was currently completing discussions with 6 major manufacturers on how to get the technical specification right. They will then need to revise the legal text before the Workgroup can progress any further and the Workgroup is therefore requesting a 2 month extension to the timeline.

9242. The Panel agreed to the revised timeline.

GC0159: Introducing Competitively Appointed Transmission Owners

9243. ML explained that the **GC0159** Workgroup would like to widen the scope of one of the Terms of Reference (ToR) set by the Panel, and add in the following additional red text:

“Consider interactions and impacts on wider Grid Code modifications in particular GC0103, GC0117 and GC0156 modifications; and”

9244. AF and RL did not object to the amendment but stated that this should be covered off under their general duties as a Workgroup and did not feel that this specifically needed to be called out within the ToR.

9245. The Panel agreed the amendment to the ToR.

GC0156: Facilitating the Implementation of the Electricity System Restoration Standard

9246. ML advised that the **GC0156** Workgroup Consultation had gone out. It was a very lengthy document which would take around 4 days to read and included 28 Workgroup Consultation questions. Given the scale of the document and industry feedback on this, Code Admin are now looking into whether they can hold a webinar to guide Industry through it.

9247. AC stated that he was disappointed that the Workgroup’s request to extend the Consultation for a longer period over Christmas was declined. AC also noted that there were some Annexes within the Consultation that had not been seen by the Workgroup before it was published.

9248. RR stated that a webinar would be useful as Elexon were also thinking of responding to the consultation.

9249. RL agreed that a Webinar would be useful, and that Industry would also need sufficient time to respond to the consultation.

9250. ML advised that as Technical Secretary for **GC0156** Code Admin believed that all of the relevant documents had been shared with the Workgroup. ML and AC agreed to pick this up offline, to check what documents had been missed. ML explained that, with regard to the timeline, Code Admin had agreed to extend this from the 9 December 2022 to the 21 December 2022. However, it could not be extending any further to 4 January 2023, because Code Admin did not have enough resource over this period to summarise the Workgroup Consultation responses ahead of the next Workgroup meeting.

9251. GN questioned whether they could delay the Workgroup meeting to enable the extension of the Consultation response period.

9252. The Chair requested that ML take these issues away to see if there are any lessons to be learnt around sharing documents with Workgroup members prior to publishing, and to check if the Consultation period can be extended. **Action 431.**

9253. ML explained that, if the deadline is extended, a comms will be sent out to industry to explain this, along with the option to attend the webinar that Code Admin are looking to host.

8. Prioritisation Stack / Dashboard

9254. ML explained that, as **GC0160** had now been sent to Ofgem for a decision, this would be removed from the stack and all the other modifications would move up one level.

9255. The Panel reviewed the prioritisation stack and agreed that no other changes were required.

9256. The updated prioritisation stack can be found in the Headline Report via the following link:

<https://www.nationalgrideso.com/document/271981/download>

9. Workgroup Reports

9257. There were no Workgroup Reports presented to the Panel.

10. Draft Final Modification Reports

9258. There were no Draft Final Modification Reports presented to the Panel.

11. Reports to Authority

9259. There were no updates for the Panel.

12. Implementation updates

9260. There were no updates for the Panel.

13. Governance

9261. There were no updates for the Panel.

14. Grid Code Development Forum (GCDF)

9262. JW advised that two GCDF meetings took place on the 2 and 23 November 2022 where the discussion included a proposal to update the Electricity Standards documents by adding in an additional EDL Reason Code to support the Constraint Management Pathfinder. An update was also provided on the ESO RIIO-2 Business Plan, prior to the release of the Ofgem draft determinations, along with an update on the Digitalised Whole System Technical Code. There was also a discussion on a potential consequential modification as a result of [GSR029](#), and it was noted that the modification may be coming to the Grid Code Panel in February/March 2023.

9263. AC explained that it was very likely that this consequential modification will need to be raised and explained that it will look to define the data that network operators need to provide to the ESO so that they could implement the GSR029 proposals and will require changes to be made to the Planning Code.

9264. FK delivered a presentation on the Whole System Technical Code project to the Panel. FK explained the aim of the Workstream, the proposed timeline, the feedback that the ESO have received from stakeholders, along with the work they have done to date on trying to simplify and rationalise Operating Code 2 (OC2).

9265. AC stated that he was still conscious of the low level of engagement and participation from industry, given that simplifying OC2 was not going to be as simple as had been originally thought. AC highlighted that there were a lot of ambiguities and uncertainties in the existing text that also needed to be addressed along with changes to some of the definitions. But, as the definitions ripple through a lot of the code this will be a challenging piece of work. AC questioned whether the Workstream would try to address all these issues.

9266. FK explained that the ESO had been trying to reach out to the steering groups members to make sure they participate in future meeting or send their alternates. FK also confirmed that the Workstream would be looking to address any ambiguities and uncertainties in the text along with trying to simplify it. However, with regard to the definitions, the ESO are still deciding whether to look at these section by section or by looking at the grid code as a whole.

ESO

9267. RL commended FK for the work the ESO had done to date but highlighted that they needed to make sure that they do not get to the point where the requirements within the Grid Code become less clear.
9268. FK explained that the red line is the retention of existing obligations and to make sure that simplification doesn't erase requirements or change requirements within the Grid Code.
9269. GN and AF supported the simplification of the code but agreed that the functionality and specificity of it still needed to be there, but in a clearer and more concise way. However, until the workstream grappled with the issue around definitions, which is a whole code issue, it would still be a very complex task. Reviewing OC2 and addressing the definitions throughout the Grid Code would be a good starting point.
9270. FK explained that the ESO legal team have advised that they cannot do good simplification if they do not address definitions.
9271. JW explained that the ESO recognised that that this was a huge task. Each time a definition was changed, they would have to go back and check all the times that specific definition was mentioned within the Grid Code to make sure that there were no unintended consequences. JW advised that they were still considering whether the ESO should get their own internal lawyers to do these checks, external third party lawyers or rely on industry to do this. It is more important that this is accurate and correct, even if this means timelines are extended.
9272. RR explained that the BSC is now a digitalised code and is available on the Elexon website. It has recently had 2 new features added to it, one of which is that, when you click on a defined term, it gives you the definition on the right hand side of the page. RR advised that Jeremy Caplin was the person to speak to within Elexon for further information on this.
9273. FK thanked RR and stated that Jeremy Caplin was already on the steering group.

15. Standing Groups

Distribution Code Review Panel Update

9274. No updates for Panel.

Joint European Stakeholder Group (JESG)

9275. ML advised that the November meeting was cancelled and that the next meeting would be held on 13 December 2022.

16. Updates on other Industry Codes

9276. RR explained that there was a lot of collaboration work going on between the ESO and Elexon in relation to winter readiness and thanked the ESO for all the support they were providing.

17. Blockers to Modification progress

9277. ML advised that there was nothing specific to report. The delays in timelines have been due to sorting out legal text or getting information/analysis requested by workgroups.
9278. ML stated that she did not like using the word "blocker." RL suggested changing it to "challenges".

18. Horizon Scan

9279. ML presented the new CACOP Horizon Scan and explained that this would be presented across the Code Admin Panels going forwards. ML stated that there would be around 7 new modifications being raised in December. Quite a few of them would be for the STC Panel to consider and there would also be some consequential modifications from [GC0156](#). ML also advised that the Offshore Coordination modification for the Grid Code would be raised in

January 2023 and that the modifications from the Balancing Programme to replace faxes would also start to be raised in January 2023. She advised that the Market-wide Half-Hourly Settlement (MHHS) reform was on the horizon scan for information and that the Panel would also start seeing modifications for the Digitalised Whole System Technical Code from around April 2023.

19. Electrical Standards

9280. There were no updates for the Panel.

20. Forward Plan Update / Customer Journey

9281. There were no updates at this Panel meeting.

21. Any Other Business (AOB)

9282. There was no other business.

22. Close

9283. The Chair closed the meeting.

The next Grid Code Review Panel meeting will be held on 15 December 2022 via Microsoft Teams.

New Modification Proposals are to be submitted by 30 November 2022.

Grid Code Review Panel Papers Day is 7 December 2022.