

GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Stations requirements

19 July 2023

Online Meeting via Teams

WELCOME



Agenda

Welcome	Chair
Objectives and Timeline	Chair
Actions Review	Chair
Elexon Update	Elexon Rep
WAGCM1 Update	All
Legal Text	ESO Rep
Workgroup Report	All
Terms of Reference Review	All
Any Other Business	Chair
Next Steps	Chair

Workgroup Membership

Role	Name	Company
Proposer	Garth Graham	SSE
Workgroup Member	Mike Kay	Electricity North West
Workgroup Member	Richard Woodward	National Grid Electricity Transmission (NGET)
Workgroup Member	Chris Marsland	AMPS
Workgroup Member	Isaac Gutierrez	Scottish Power Renewables
Workgroup Member	Graeme Vincent	SP Energy Networks
Workgroup Member	Alan Creighton	Northern Powergrid
Workgroup Member	Richard Wilson	UK Power Networks
Work Group Member	Paul Youngman	Drax
Work Group Member	Antony Johnson	National Grid ESO
Workgroup Member	John Lucas	Elexon
Workgroup Member	Tim Ellingham	RWE
Workgroup Member	Andrew Akani	Western Power Distribution
Workgroup Member	Roddy Wilson	SHE Transmission
ESO Rep	David Halford	NGESO

Code Modification Process Overview



Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared - Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives

Timeline for GC0117

Stage	Dates	Comments
Workgroup 18	19/07/2023	
Workgroup 19	08/08/2023	Complete Workgroup Vote
Workgroup Report to Panel	16/08/2023	
Post Workgroups		
Code Administrator Consultation	29/08/2023 - 29/09/2023	
Draft Final Modification Report to Panel	18/10/2023	
Final Modification Report to Panel to check Votes	30/10/2023	
Final Modification to Ofgem / Appeals Window opened	07/11/2023	
Implementation Date	TBC	

Action Review

Action Number	Workgroup raised	Owner	Action	Due by	Status
70	WG16	DD/DH	Layout what the CBA is seeking to address against the aims of the modification; the costs that will flow from the changes to industry parties		Proposing to close Completed as part of the impact assessment
73	WG17	All	Workgroup to read through the document to ensure this meets the requirement of Action 66		Proposing to close Recirculated documents in Workgroup 18 papers
74	WG17	TJ/DH	To circulate any relevant updates to GC0117 Workgroup post the ESO Compliance Team presentation to the ITCG and DCode Panel taking place on the 1 June 2023.		Proposing to close Circulated as part of Workgroup 18 papers
75	WG17	DH/TJ/MK/GV	Clarify what exactly is required regarding the CBA analysis and the Ask is to go to the DNO community in relation to capturing the potential additional costs to DNOs		Proposing to close Additional data has not been able to be acquired
76	WG17	SK/Team	Investigate whether the ESO has the information required to conduct a retrospective CBA if required		Proposing to close Confirmation that the ESO does not have the required information
77	WG17	RGA	To follow up with Elexon for representation		Proposing to close John Lucas now part of Workgroup

Terms of Reference

Workgroup Term of Reference

- a) Implementation and costs;
- b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text;
- c) Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report
- d) Consider EBR implications
- e) The current transmission and generation characteristics in Scotland compared to those in England and Wales and whether the rationale for the thresholds being set at the current levels still applies given the current and projected generation composition and transmission infrastructure;
- f) Cross code impacts (BSC, CUSC and DCode) and impact on EBR;
- g) Consider any emerging thinking from the Open Network project;
- h) Any interaction with generator licencing thresholds or requirements;
- i) The impacts for stakeholders including NGESO, iDNOs, TOs, DNOs and generators;
- j) Implications for new connectees in relation to data exchange, planning, market engagement and any other areas of change;
- k) The implications associated with implementing any changes retrospectively so that they apply to existing connectees rather than just for new connectees; and
- l) The implementation options together with the associated costs and benefits.

ELLEXION

**BSC Impacts of Grid Code Modification
GC0117**

19 July 2023

Background: the treatment of Embedded Generation in the BSC

The BSC doesn't distinguish between Large, Medium and Small Power Stations. The key BSC distinction is between Exemptable and Licensable Generating Plant:

- Any Power Station under 50 MW (including Licenced Generation) is likely to be Exemptable
- Power Stations between 50 MW and 100 MW with Licence Exemptions are also Exemptable

The BSC has two different arrangements for registering Metering Systems and collecting and aggregating Metered Data:

- The Supplier Meter Registration Service (SMRS) and associated Supplier Volume Allocation (SVA) processes are open to Exemptable Generating Plant, not Licensable
- The Central Meter Registration Service (CMRS) and associated Central Volume Allocation (CVA) processes are open to both Exemptable and Licensable Generating

Exemptable Power Stations therefore have a number of options for registering their Metering Systems:

- A Licensed Supplier can register an MPAN in the Supplier Meter Registration Service (SMRS)
- The Generator can register in the Central Meter Registration Service (CMRS)
- Another BSC Party (Generator or Supplier) can register in CMRS

Licensable Power Plants must be registered in CMRS by the Generator, and have their own BM Unit(s)

The formal definition of "Exemptable" Generating Plant (from BSC Section K1.2.2) is:

Generating Plant where the person generating electricity at that Generating Plant is, or would (if it generated electricity at no other Generating Plant and/or did not hold a Generation Licence) be, exempt from the requirement to hold a Generation Licence;

Background: registering in SMRS

Exemptable Generating Plant registered in SMRS:

- Is not required to have its own BM Unit (i.e. may form part of a larger Supplier BM Unit)
- Could still choose to submit Bids and Offers into the BM through the Supplier (Additional BM Unit) or a Virtual Lead Party (Secondary BM Unit)

An Embedded Exemptable Large Power Station (EELPS) registered in SMRS must enter into a BELLA with NGESO, which:

- Allows the Generator to submit Physical Notifications (PNs) and other data for their Generating Units, as required by the Grid Code
- Does not allow them to receive payments for Bid Offer Acceptances

Background: does the BSC reference Large, Medium or Small Power Stations?

BSC Section K (and associated BSC Procedure BSCP15) references “Small Power Station” only in the context of defining when different plant can be aggregated into a single BM Unit:

3.1.2B A collection of smaller aggregations of Plant and Apparatus may be registered as a single BM Unit, provided:

- (a) the Registered Capacity of that collection of Plant and/or Apparatus is no larger than that specified in respect of a Small Power Station; and
- (b) the Exports from that collection of Plant and/or Apparatus are subject to common control as a single BM Unit.

3.1.4 Each of the following shall be a single BM Unit, and shall be deemed to satisfy the requirements in paragraph 3.1.2:

...

- (cc) premises (of a Customer supplied by a Party) which are directly connected to the Transmission System at more than one Boundary Point, provided that the total Imports to the Plant and/or Apparatus comprised in the BM Unit are equal to or less than the value limits prescribed in respect of a Small Power Station;

The BSC does not reference “Medium Power Station” or “Large Power Station”.

Potential BSC impact of GC0117 Proposed

We understand that the Proposed solution will, for new Power Stations (not existing ones):

1. Introduce a GB-wide 10MW threshold for Large Power Stations
2. Require new Large Power Stations to be treated as BM Units (registered in CMRS), not as Generating Units with BELLAs

We believe point 2 requires a change to BSC Section K2.1.1 to require CMRS registration for new Large Power Stations. The current K2.1.1 drafting is as follows:

2.1.1 A Boundary Point Metering System shall be registered in CMRS where:

- (a) the Metering Equipment measures quantities of Imports to or Exports from Plant or Apparatus which is directly connected to the Transmission System; or
 - (b) the Metering Equipment measures quantities of Imports to or Exports from a Licensable Generating Plant;
- or

A Workgroup may also wish to consider whether, in light of point 1, any changes are required to K3.1.2B and K3.1.4 (see previous slide).

Potential BSC impact of GC0117 Alternative

We understand that the Alternative solution will, for new Power Stations (not existing ones):

1. Introduce GB-wide 50 MW and 100 MW thresholds for Medium and Large Power Stations
2. Possibly include provisions for DNOs to provide planning timescale data relating to the export from Small and Medium Power Stations to assist NGESO demand forecasting

We do not believe this necessarily impacts the BSC, although (as for the Proposed) a Workgroup may wish to consider whether, in light of point 1, any changes are required to K3.1.2B and K3.1.4.

WAGCM1 update

Under this option, the Power Station thresholds of Small (less than 50MW), Medium (50 – <100MW) and Large (100MW or greater) that currently apply in England and Wales would also be applied in Scotland. The Large, Medium, and Small Power Station classification criteria would then be the same across GB. This could be implemented 10 working days following The Authority's decision.



Legal Text Review

For the original proposal Legal Text, it's worth noting that we have been in discussion with the ESO rep in relation to the GC0139 modification which seeks to increase the scope and detail of planning-data exchange between DNOs and National Grid ESO

There has been concerns from this workgroup that in the original proposal as part of GC0117, it could result in an increase in network data that would need to be provided to the ESO by the DNOs with no real benefit to both parties.

With that in mind, Tony has made some amendments to the Planning Code to reflect that the ESO/DNOs will agree the level of data for Embedded Large Power Stations.

This may require further changes and updates to the DRC but we are in contact with the GC0139 WG to ensure any required changes as part of the GC0117 solution are incorporated into the Legal Text.



Workgroup Report Feedback

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Any Other Business



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