

# Code Administrator Meeting Summary

**Meeting name: GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements Meeting 19**

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Date: 08/08/2023

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## Contact Details

Chair: Milly Lewis, National Grid ESO [milly.lewis@nationalgrideso.com](mailto:milly.lewis@nationalgrideso.com)

Proposer: Garth Graham, SSE Generation [garth.graham@sse.com](mailto:garth.graham@sse.com)

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## Key areas of discussion

The aim of Workgroup 19 was to cover updates to actions, discuss consequential changes and compliance responsibilities, and to review the legal text.

## Workgroup Objectives and Action Review

The Chair introduced the Workgroup objectives and confirmed quoracy, before confirming to the Workgroup the title name change for this modification, to reflect the change from 'Power Generating Module' to 'Power Station' which was approved by the Grid Code Review Panel on 27 July 2023.

Workgroup members agreed a change to the timeline to incorporate additional Workgroups. An update of all actions are in the actions log below.

## Potential consequential changes

A Workgroup member delivered a presentation on the potential consequential changes to the BSC as a result of Grid Code Modification GC0117. This included changes required for both the Original Proposal and WAGCM1.

One Workgroup member queried why these changes are required, given that the proposed solution of GC0117 already exists in the North of Scotland. It was clarified that the BELLA option would be removed under the GC0117 Original Proposal, with Generators from 10MW being required to connect as full BM Units. With this option, Users would have to sign a Bilateral Embedded Generator Agreement (BEGA) and meet the requirements and obligations of this agreement.

Three options for changes to the BSC in relation to allowing generating units and demand Boundary Points to be aggregated into a single Central Volume Allocation BM Unit, were presented, with advantages and disadvantages of each one. The Proposer of the BSC modification would ultimately need to decide which option would be best.

One Workgroup member queried whether the existing BSC legal text could remain unchanged if GC0117 is implemented. The Elexon representative confirmed they had assessed the BSC to understand the implications of GC0117. As a result of this work, minor changes to the BSC have been identified, especially if the Original Proposal is approved.

One Workgroup member raised that there would be sufficient time for any consequential modifications to be raised/ progressed ahead of Ofgem being able to make a decision on GC0117, as the implementation date would not be until circa, 2027. This will be discussed in a meeting with the Authority (**Action 79**).

### **Compliance responsibilities**

A Workgroup member talked through compliance implications of GC0117 in regard to the Dcode, discussing advantages and disadvantages of compliance being undertaken by either DNOs or the ESO, highlighting an overlap between G99 and the Grid Code.

One Workgroup member suggested that a Workgroup should be set up to look at this issue. Another Workgroup member queried how compliance responsibilities align with Rate of Change of Frequency, highlighting that loss of mains requirements need to be reviewed for Power Stations above 10MW (**Action 84**).

One Workgroup member queried whether a Power Generating Module Document (PGMD) could fulfil compliance needs, and it was discussed that policy issues need to be discussed to ensure smooth implementation of GC0117 (**Action 85/86**).

### **Legal text**

Legal text was presented to the Workgroup, with a query as to whether the Workgroup were comfortable with the wording used in definitions.

One Workgroup member queried the absence of substantial modifications from a section of legal text; however it was clarified that this was covered later in the legal text review.

There was discussion around whether the meaning of the word 'controlled' referred to BMU participation, and whether the word User should be part of the legal text. It was decided that the legal text should be further reviewed by the legal team, and that an additional legal text Workgroup be set up to review the full legal text.

### **AOB**

A Workgroup member presented slides outlining the differences between BELLA and BEGA arrangements to the Workgroup (previously shared at Workgroup 9 in December 2021), as there were some queries on why BELLA agreements would not be used going forward were the Original Proposal for GC0117 to be approved.

One Workgroup member queried why BELLAs cannot exist in future, and it was clarified that a BELLA is treated as a sub-set of a full BM (is defined as a generating unit in Balancing Code1 & Balancing Code 2 of the Grid Code), which limits the ESOs ability to dispatch generation in the BM. As a consequence, and to realise the full benefits of the CBA, it is proposed that under the Original Proposal all plant above 10MW is treated as a full BM Unit which will be realised through a BEGA.

A Workgroup member raised the importance of this being mentioned within the Workgroup report, however another member queried whether the removal of the BELLA option was within the scope of GC0117. It was confirmed that you cannot segregate GC0117 from the wider obligations on Large Power Stations, especially noting that BELLAs are only available in Scotland and not England and Wales.

**Next Steps**

The Chair summarised the next steps as follows:

- Invites to be sent out for additional Workgroups in September and October, and a legal text review session to be arranged.

**Actions**

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
70	WG16	DD/DH	Updated action: Investigate potential cost impact on industry from this modification  Previous wording: 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	Awaiting information from FES team regarding the potential number of extra generators falling under the 10MW proposal	ASAP	Open
78	WG18	ML	Reach out to Aggregators for representation on Workgroup	Invite to attend aggregator forum on 07 September 23.	ASAP	Closed
79	WG18	GG/TJ/JL/DH	Discuss with Ofgem whether any consequential modifications need to be presented at the same time as GC0117 or can follow after a decision has been made on the Grid Code modification.	Meeting to be arranged prior to September Workgroup	ASAP	Open
80	WG18	GG	Consider updating Original Proposal to incorporate data requirements	Decided that Original will remain unchanged	ASAP	Closed
81	WG18	AC	Contact SHET to investigate arrangements and their views	AC to share outcome in written form with Workgroup	Circulated on 09 August 2023	Closed
82	WG18	SK	Provide analysis and narrative to the Workgroup	Circulated on 24/07/23	ASAP	Closed
83	WG18	TJ/DH/SK	Investigate whether qualitative analysis could be completed to show whether there are any	No benefit to this. Circulated to Workgroup.	ASAP	Closed

			benefits of the ESO receiving planning data down to 1MW.			
84	WG19	TJ/MK	Review and confirm loss of mains requirements for above 10MW	NA	ASAP	Open
85	WG19	TJ/MK	Ensure likely impacts to G99 are captured	NA	ASAP	Open
86	WG19	TJ/MK	Discuss generator compliance with legal	NA	ASAP	Open

**Attendees**

Name	Initial	Company	Role
Milly Lewis	ML	Code Administrator, ESO	Chair
Lizzie Timmins	LT	Code Administrator, ESO	Tech Sec
Garth Graham	GG	SSE Generation	Proposer
Alan Creighton	AC	Northern Powergrid	Workgroup Member
David Halford	DH	ESO	ESO Representative
Graeme Vincent	GV	SP Energy Networks	Workgroup Member
Isaac Gutierrez	IG	Scottish Power Renewables	Workgroup Member
John Brereton	JB	Innova	Observer
John Lucas	JL	Elexon	Workgroup Member
Mike Kay	MK	Electricity North West	Workgroup Member
Paul Drew	PD	Ofgem	Authority Representative
Paul Youngman	PY	Drax	Workgroup Member
Richard Wilson	RWi	UK Power Networks	Workgroup Member
Richard Woodward	RW	National Grid Electricity Transmission	Workgroup Member
Tony Johnson	TJ	ESO	Workgroup Member