

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 20

Date: 13/09/2023

Contact Details

Chair: Milly Lewis, National Grid ESO milly.lewis@nationalgrideso.com

Proposer: Garth Graham, SSE Generation garth.graham@sse.com

Key areas of discussion

The aim of Workgroup 20 was to discuss interactions in North Scotland, and to review the draft legal text and Terms of Reference.

Workgroup Objectives and Action Review

The Chair introduced the Workgroup objectives and confirmed quoracy, reviewing the timeline for the modification. The Proposer queried whether submission of the DFMR to Panel could be bought forward, and the Chair confirmed this could be reviewed once the Workgroup Report is finalised.

An update of all actions are in the actions log below.

Discussion on existing interactions ESO have with embedded generation in North Scotland where the Small – Large threshold is 10MW

The Workgroup discussed interactions between the ESO and embedded generation in North Scotland, that were raised by SSEN Distribution.

One Workgroup member queried that as the existing arrangements have been in place since 2005, why it has taken so long for the problems to be raised. Another Workgroup member clarified that there are currently only a small number of sites affected, however this number may increase if the threshold is harmonised across GB through GC0117. One Workgroup member agreed to investigate any issues SPEN face (**Action 91**).

Several Workgroup members raised queries around constraint management, and how ESO instructions would work, combined with Active Network Management (ANM) instructions. It was highlighted that there are currently no arrangements in place for DNOs to have visibility of ESO BM instructions, meaning that DNOs cannot interact with these instructions. One Workgroup member queried whether Generators would comply with ESO or ANM instructions in the event that both instructions were given. It was clarified that ANM would take priority over any ESO instructions to avoid damage to DNO systems. An ESO representative agreed

to speak to the control room regarding how they intend to manage ANM with the threshold change, and the impact of this on operational planning and constraints (**Action 88**). One Workgroup member highlighted that the ESO need to improve their planning to allow for effective management of this.

A query was raised regarding Bilateral Exemptible Large Licence Exempt Generator Agreements (BELLA) and Bilateral Embedded Generation Agreements (BEGA), with the ESO representative clarifying that the difference between them is that BELLAs are treated as generating units within the Balancing Mechanism (BM), rather than as BM units. This means that they supply the same data as BEGAs, but not bid offer data or dynamic parameters, so they have diminished control in comparison to BEGAs.

One Workgroup member raised that there may be some unintended consequences of modification GC0117. It was agreed that the impact assessment should cover potential negative effects with several Workgroup members agreeing to investigate this (**Action 89**).

Two Workgroup members also agreed to investigate how the Generation Export Management System (GEMS) works in South Scotland (**Action 90**).

Legal text

The draft legal text was presented to the Workgroup; the ESO representative clarified that all comments from the legal text review workshop had been incorporated, and that legal text for WAGCM1 has not yet been drafted.

The ESO representative advised that new wording has been drafted consistent for several definitions based on legal advice. Several typographical changes were suggested by the Workgroup, which the ESO agreed to review prior to the next Workgroup.

The Proposer suggested that PC.A.2.1.3 was split into two clauses, to make it clear when the new obligations come into effect, removing part of this in a later modification once GC0117 has come into effect.

One Workgroup member queried whether the legal text in PC.A.2.2.1 implied an obligation on Generators. The ESO representative agreed to review this.

Another Workgroup member queried the 'continuously manned' requirement in EC.7.9(a), and asked if this was still a requirement with the increase in automation. The Proposer agreed to review this. It was also highlighted that the word 'manned' should be amended to 'staffed' to reflect changes to the Grid Code as part of GC0153.

One Workgroup member queried whether the definition for a Large Power Station should consider solar. The ESO representative agreed to review this (**Action 94**).

The ESO also proposed a date of 01 June 2027 to replace DDMMYY in the legal text after internal discussions with IT and Product Owners. It was advised that this date had been chosen to avoid winter and regulatory changes that are normally implemented in the final quarter of the financial year. The Proposer asked the ESO to consider whether this could be 01 April 2027 instead, to coincide with the beginning of a new charging year, but was overall happy with the suggested implementation date of 01 June 2027.

Terms of Reference Review

The Chair reviewed the Terms of Reference with the Workgroup to identify any outstanding items.

- (a) The ESO has already undertaken a CBA, impact assessment and qualitative assessment, and identified IT costs exclusive to GC0117. DNOs have agreed to assess the potential impacts of GC0117 (**Action 89**), and the ESO are currently looking into a potential increase in resourcing costs due to the projected increase in BEGA applications and other associated tasks. (**Action 70**).
- (b) Legal text has been drafted for the Original but needs finalising, and legal text has not yet been finalised for WAGCM1. Elements of the agreed Original legal text will flow into WAGCM1 legal text.
- (c) The Workgroup agreed that all affected parties have been represented.
- (d) The Workgroup do not believe that there are any EBR implications within this modification.
- (e) It was queried whether the CBA covered costs for Generators, which is being looked into by the ESO (**Action 70**), with a Generator Cost Impact Assessment already completed. A viewpoint from the SSEN Distribution control room has been considered by the Workgroup, and a Workgroup member is seeking similar views from SPEN (**Action 91**).
- (f) It has been identified by the Workgroup that there will be a consequential BSC modification and potential CUSC and SQSS modifications, however it was agreed with Ofgem that any modifications can be raised after they have made a decision on GC0117. There will also be potential DCode changes, and any STC impact on definitions needs to be investigated (**Actions 92 and 93**).
- (g) This has been considered by the Workgroup, however it was suggested that the Open Networks Team return to a future Workgroup to provide an update on the current workplan which includes Megawatt Dispatch.
- (h) Content regarding generator licensing thresholds or requirements was part of the Workgroup Consultation so has been fully considered by the Workgroup.
- (i) Impacts on stakeholders have been considered, however more needs to be done to consider anticipated DNO impacts (**Action 89**). One Workgroup member also raised whether iDNO impacts had been covered and whether communication between the ESO and iDNOs needs to be considered.

One Workgroup member queried whether it was possible to share the questionnaire with Generators again; the ESO queried whether it would be useful to share their Generator Cost Impact Assessment which gives an analysis of the obligations required from parties and the potential costs of meeting this obligations and agreed to share this following the Workgroup.
- (j) The Workgroup did not express anything further that is required to meet this.
- (k) A Workgroup member expressed opinion that this has been met by the Workgroup. One Workgroup member queried whether data would be of benefit and if it could be non-retrospective. It was highlighted that the final version of analysis would be helpful for this. Another Workgroup member stated that they believed data requirements were out of scope of this modification.

(l) The Workgroup did not express anything further that is required to meet this.

AOB

One Workgroup member queried if the CBA analysis and Generator Cost Impact Assessment completed as part of GC0117 could be circulated to the Workgroup, with a summary of the analysis (**Action 87**). The Proposer of WAGCM1 clarified that they would make a decision on whether to withdraw WAGCM1 following a review of the analysis. It was agreed that legal text for WAGCM1 would not be finalised until this decision has been made.

Next Steps

The Chair summarised the next steps as follows:

- Draft Workgroup Report to be circulated for comments.

Actions

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
70	WG16	DD/DH	Investigate potential cost impact on industry from this modification	Under discussion with FES team	ASAP	Open
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.	Agreed that consequential modifications can be raised following Ofgem decision on GC0117	ASAP	Closed
84	WG19	TJ/MK	Review and confirm loss of mains requirements for above 10MW	NA	ASAP	Closed
85	WG19	TJ/MK	Ensure likely impacts to G99 are captured	NA	ASAP	Closed
86	WG19	TJ/MK	Discuss generator compliance with legal	NA	ASAP	Closed
87	WG20	DH	Write a summary of analysis completed to date and circulate with final analysis documents	NA	WG21	Open
88	WG20	TJ	Speak to control room regarding impacts on operational planning and constraints, and ANM controlling of generators. Investigate how they intend to manage ANM with the threshold change	NA	WG21	Open
89	WG20	AC/MK/GV/RW	Investigate potential impacts of GC0117	NA	WG21	Open
90	WG20	TJ/GV	Investigate how GEMS works in South Scotland	NA	WG21	Open

91	WG20	GV	Investigate any issues SPEN face with thresholds	NA	WG21	Open
92	WG20	GV	Investigate any STC impact of GC0117	NA	WG21	Open
93	WG20	MK	Investigate whether any DCode changes need to be done imminently	NA	WG21	Open
94	WG20	TJ	Review legal text prior to next Workgroup	NA	WG21	Open
95	WG20	ML	Reach out to Open Networks Team regarding workplan	NA	WG21	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
Andrew Akani	AA	NGED	Workgroup Member
Bukky Daniel	BD	EDF	Observer
Chris Marsland	CM	AMPS	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 Lucas	JL	Elexon	Workgroup Member
Mike Kay	MK	Electricity North West	Workgroup Member
Mzamoyabo Sibanda	MS	SSE Renewables	Observer
Richard Wilson	RW	UK Power Networks	Workgroup Member
Tim Ellingham	TE	RWE	Workgroup Member
Tony Johnson	TJ	ESO	Workgroup Member