

Code Administrator Meeting Summary

Meeting name: Workgroup meeting 10

Date: 02/10/2023

Contact Details:

Chair: Catia Gomes – catia.gomes@nationalgrideso.com

Proposer: Gareth Stanley – Gareth.Stanley@nationalgrideso.com

Key areas of discussion

Workgroup 10 for CM087 met on Monday 2 October with the main objectives; reviewing consultation responses and the latest legal text. The Chair advised that a Workgroup Report has been prepared however felt that the Workgroup was not at the stage to run through this.

Review of Consultation Responses

The Chair shared with the Workgroup the 3 responses received, and asked the respondents to share their key points:

The first Workgroup member began and highlighted the following points:

- The tender process and the modification should align.
- Felt that there didn't need to be so much detail in the STC if the requirements are there as part of the tender process.
- Still requires clarification who will be overseeing total system compliance as its going to be part of wider investment program with TO's etc. it should not be treated like a generator.

Secondly, a Workgroup member gave their key points from their joint consultation response as follows:

- They were in agreement that the change will resolve the defect that will occur if the legislation comes into effect and bring in CATOs;
- They have concerns that often in the legal text it refers to generator compliance processes and believes is not fitting for a CATO body who is going to be a TO, and that it needs to be further looked at to bring in alignment.
- They have concerns about extra pressures on onshore TOs to ensure milestones are met and worried TO relations may become strained; and
- That there are huge regulation changes at the moment and concerned that the implementation of the CATO regime is an excessive burden on TOs and believes it doesn't answer the problems to meet net zero

The final response being the Proposer highlighted their key points as follows:

- Acknowledges that there is currently nothing in STC and the remit of this modification was to develop and establish a process.
- Very much still happy to take on comments and work with the Workgroup to come to an agreement to the amendments of the legal text.

Review of draft legal text

The Proposer took the group through the feedback received on the latest draft legal text, addressing comments with the Workgroup members that left them (or their representatives).

Key points addressed were:

Section D

- At 2.2.6.1, the word “assets” is to be deleted so as not to be construed as existing transmission owners.
- Housekeeping queries were addressed, and amendments will be made to make the legal text consistent.
- A Workgroup member queried whether the defined term in clause 2.7 could be referenced to STCP 16-1 for ease of reference. The Proposer will check this point with the legal team.
- Appendix A now includes two diagrams to reference boundaries to simplify the appendix.
- The insertions of 2.9.4 – 2.9.6 a Workgroup member believed the insertions should be included in the tender process and not in the STC. They continued to explain that if we limit what is codified now gives us flexibility in the future and effectively should be imported from the tender process. The Proposer responded that they would look into other wording suggested from clause 2.9.1 to 2.9.6
- The addition of clause 2.4.4 – the Proposer commented that the addition was inserted to deal with a comment made by a Workgroup member to necessity clearly link to the tender. Workgroup member responded that depending what the detail is in specification and everyone is content with the tender process. The Proposer said they would also include links that PTOs will be involved in the CBA Process.

Section J (definitions)

- The Proposer took the Workgroup through the proposed new definitions in this section, and no objections were raised.

Terms of Reference review

The Chair reviewed the Terms of Reference with the Workgroup who were in agreement that terms were being met.

Timeline review

The Chair shared the current timeline and pointed out the additional 3 workgroups to work through the solution with the workgroup report being issued to Panel in December. Discussions were held around the hope of the legislation being passed through parliament at end of October. The Chair suggested to continue to refine the solution ready to submit so that CM087 aligns with other CATO modifications being implemented.

A Workgroup member queried whether the modification could be paused given the high hurdle to refine. The Proposer responded that ideally they would like to push on in readiness for when competitors begin the bidding process in order for CATOs to understand who the other STCP parties are and for them to have a clear understanding of the process.

A Workgroup member then suggested that they might consider raising an alternative modification with the Chair suggesting any alternatives being considered could they run the solution past the Chair ASAP to see whether the solution could be worked into the Proposer’s solution.

The Proposer said they would be happy to roll back any elements of the legal text and happy to work it out between them.

AOB

The Chair opened the conversation for any other business, but the Workgroup had no other points of discussion to raise.

Next Steps

The Proposer agreed to set up a workshop to work through the STCPs and circulate a meeting invite.

Actions

Action number	Workgroup Raised	Owner	Action	Comment	Due by	Status
1	9	GS/AJ	ESO to review what diagrams are existing/can be drafted to share with the Workgroup for inclusion in the legal text	Section D	30 Aug	Open
2	9	GS/AJ & SO/RW for NGET	ESO & NGET to review the new clauses 2.8.4, 2.8.5, 2.8.6	Section D	30 Aug (ESO) 01 Sept (NGET)	Open
3	9	GS	Feedback from the Workgroup members and ESO SME to be actioned and updated legal text documents shared for the Workgroup to review.	Section D, J, Schedule 4 (and STCPs the STC changes relate to)	30 Aug	Open
4	9	SO, RW	To be confirmed whether additional wording is needed for ‘STC Proposed Alterations’ in the consultation document		30 Aug	Open

Attendees

Name	Initial	Company	Role
Catia Gomes	CG	Code Administrator, ESO	Chair
Tammy Meek	TM	Code Administrator, ESO	Tech Sec
Gareth Stanley	GS	ESO	Proposer
Steve Baker	SB	ESO	Proposer
Aggie Gwozdz	AG	ESO	Observer
Anthony Johnson	AJ	ESO	SME
Gareth Williams	GW	SP Transmission	Workgroup Member
Graeme Vincent	GV	SP Energy Networks	Observer
Greg Stevenson	GS	SSEN Transmission	Observer
Joel Matthews	JM	Diamond Transmission Corp	Workgroup member
Mark Fitch	MF	TINV	Observer
Michelle Sandison	MS	SSEN Transmission	Workgroup member
Mike Lee	ML	TNIV	Observer
Richard Woodward	RW	NGET	Workgroup Member
Sarah Owen	SaO	Eclipse Power	Observer
Thomas Johns	TJ	Ofgem	Ofgem Representative