

Workgroup Consultation

GC0164: Simplification of Operating Code No.2

Overview: This modification seeks to help Users to clearly identify and understand their obligations under Operating Code No.2 (OC2) by making it more accessible, easy to navigate and understand. This is the first modification resulting from the Alignment, Simplification and Rationalisation Workstream (ASRW) of the Digitalised Whole System Technical Code project.

Modification process & timetable



Have 5 minutes? Read our [Executive summary](#)

Have 45 minutes? Read the full [Workgroup Consultation](#)

Have 120 minutes? Read the full Workgroup Consultation and Annexes.

Status summary: The Workgroup are seeking your views on the work completed to date to form the final solution(s) to the issue raised.

This modification is expected to have a: Low impact on Restoration Service Providers, Generators, Interconnector Owners, Transmission Owners, Non-Embedded Customers, Network Operators and The Electricity System Operator (ESO).

Modification drivers: Efficiency and Transparency.

Governance route	Self-Governance	
Who can I talk to about the change?	Proposer: Frank Kasibante Frank.kasibante1@nationalgrideso.com 07812774066	Code Administrator Contact: Deborah Spencer Deborah.Spencer@nationalgrid.eso.com 07752466421
How do I respond?	Send your response proforma to grid.code@nationalgrideso.com by 5pm on 8 July 2024	

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Executive summary

This Modification seeks to simplify the text in the OC2 within the Grid Code to help Users to identify and understand the obligations placed upon them.

What is the issue?

The OC2 within the Grid Code is widely agreed to be overly complex, poorly structured, and difficult for Users to navigate. The text makes it difficult for Users to understand and comply with current processes or understand their own and others' obligations. It also contains Appendices which are more logically located in other sections of the Grid Code.

What is the solution and when will it come into effect?

Proposer's solution: To simplify text in the OC2 within the Grid Code ensuring any amendments has no material impacts on any User or the ESO.

Implementation date: 10 days following the Authority decision.

What is the impact if this change is made?

Ease of use of OC2 which will help Users understand and to implement their obligations correctly and for the ESO to administer the Grid Code. It is believed also, that simplifying the text could encourage potential market entrants and thus promote competition as well as encouraging innovative industry entrants.

Interactions

None identified.

What is the issue?

The Grid Code¹ is widely agreed to be overly complex poorly structured and difficult for users to navigate, for them to identify and understand the obligations placed upon them. The Digitalised Whole System Technical Code (dWSTC) project² was set up to address some of the challenges of using the technical codes and is an opportunity to support the Energy Codes Reform (ECR) objective of code simplification.

The OC2 (OC2 Operational Planning and Data Provision) is one section within the Grid Code where the complexity of the text makes it difficult for the reader to understand and comply with current processes or understand their own and others' obligations. It also contains Appendices which are more logically located in other sections of the Grid Code.

Why change?

The dWSTC project was established to create an accessible and agile code system which is easier for both new and established market participants to access, understand and navigate than the current codes. The intention is to achieve this by removing inefficiencies in operating and maintaining the codes and encouraging new industry entrants. This will also set up the codes for further development to match the current pace of change in the industry.

The ESO have received feedback from some parts of the industry, indicating that simplification of codes would deliver benefits to their organisations.

OC2 has been chosen as a starting point for simplification by the ASRW, since it is both outdated and not one of the most heavily used parts of the Code. It therefore presents a good opportunity to test out the simplification principles (Shorter and more concise text, use of diagrams, plain English, avoiding duplication of text, consider simplest version of text when drafting, rationalising definitions, should remain legally enforceable) and processes with the resources currently available. In addition, simplification of OC2 will result in better understanding of OC2's provisions by existing and new Users.

The GC0164 Workgroup established by the Grid Code Review Panel has developed the improvements proposed by the ASRW which are presented in this workgroup consultation for consideration. The proposal represents the first attempt to incorporate Grid Code simplifications flowing from the dWSTC project.

What is the solution?

Proposer's solution

Sections of Grid Code affected:

- Operating Code 2: Operational Planning and Data Provision
- Planning Code
- Glossary and Definitions.

The modifications are not intended to change any obligations placed on Users in the current OC2 text. The primary aim is to make OC2 easier to understand and apply. The

¹ [[The Grid Code](#)]

² [[Digitalised Whole System Technical Code](#)]

process followed within this modification might prove helpful while considering streamlining and improving other codes.

Collaboration across the electricity industry stakeholders is essential in gaining a better insight as to what adds most value in the attempt to simplify the Grid Code, and the formal modification of OC2 will be a key building block in the process. The ASRW has provided industry parties with the opportunity to provide early and detailed input towards the structure, content, breadth, and depth of redrafting OC2, and had developed some proposed legal text before the proposal entered this formal Code modification process. Workgroup agreed to retain one set of definitions instead of creating a separate set for each simplified section of the Grid Code

The Proposer recommended that, in addition to the specific code modification, the Workgroup could consider how effective this process of proposal development has been, and whether it is suitable for wider adoption in relation to Grid Code alignment, simplification and rationalisation modifications.

Summary of the changes to OC2

Section of OC2	What has changed
1. The Introduction, Objective, and Scope	Have been rewritten in plain English and the text has been rationalised.
2. Descriptions of procedures	Have been simplified and rationalised. Sections describing timelines have been amended to include diagrams to make them more comprehensible.
3. Text	Flowcharts have been used to remove repetitive text. Overall text length (number of words) has been reduced
4. Generator performance charts	Are proposed to be relocated in the Planning Conditions
5. All sections	Changes have been made to improve readability and make text more concise

Summary of the Changes to the Planning Code

Section of the PC	What has changed
1. PC.A.3.2.2(f)	Sub item (vi) 'Generator Performance Chart(s) shall be in the format indicated in the Planning Code Appendix G' was added to introduce location of the charts in the appendix G.
2. APPENDIX G	

Introduced as new location of
Performance Chart Examples

Summary of changes to the Glossary and Definitions

Section of the Glossary and Definitions	What has changed
National Electricity Transmission System	'NETS' has been added as an abbreviated form of the 'National Electricity Transmission System' .

Workgroup considerations

The Workgroup convened 5 times to discuss the perceived issue, detail the scope of the proposed defect, discuss the proposed solution, and assess the proposal in terms of the Applicable Code Objectives.

The modification initially followed the Standard Governance route, but it was agreed by the Authority after Workgroup 1 that GC0164 should proceed to a self-governance route. The Authority assessed the modification proposal and decided that the intended changes to the OC2 bore no material impact to the Grid Code Users.

Grid Code Panel members met on 25 January 2024 and agreed that GC0164 would follow the Self-Governance route and that the terms of reference should be updated accordingly.

Terms of Reference update (Annex 2)

During discussions on the legal text for OC2 it was agreed that a shared area would be set up by the Proposer to allow members access to the document and updates/comments to be shared. This process was intended to enable the Workgroup to save time and effort.

Consideration of the proposer's solution

The Workgroup worked through the document on a page-by-page basis, analysing the text that had been proposed by the ASRW and ensuring the changes made were fit for purpose. In some instances, members decided to retain the original text where it was thought there might be material impacts by changing it, or where it was thought the text was already transparent.

A Workgroup member expressed concern with changing or removing text from the existing OC2, stating removing detail may leave the code open for interpretation. Responding, the Proposer reiterated to members the intention was to simplify text for OC2, and to be as clear and concise as possible.

A Workgroup member highlighted that when looking into the definitions, consideration should be given to the impact it may have on other parts of the Grid Code and other Industry codes in general. The Proposer agreed, advising it is not the intention for any amendments to have material impact and if amending the definitions is too large of a task then this could be carried out separately.

Members also discussed item (f) in the Terms of Reference “Consider whether it is appropriate to have two sets of Grid Code definitions, one set to use with OC2 and a second (existing) set to be used for all other parts of the Grid Code “. The members agreed that having two sets of glossary and definitions would cause confusion and therefore it was sensible to have one single set that covers the entire Grid Code.

During legal text discussions in Workgroup meeting 4, a member sought clarification regarding references to Generator Performance Charts in Appendix G of the Planning Code.

The Proposer confirmed there was reference in OC2 regarding Generators Performance Charts, and that the key question was where in the Planning Code the reference should be introduced. It was agreed that the Proposer and a Workgroup member would have an offline conversation to resolve the issue and share with the Workgroup at the next meeting.

This was resolved after a discussion offline; the Workgroup member was happy for the example Generator Performance Charts to be moved to the new Appendix G of the Planning Code. A new reference text was proposed and drafted in PC.A.3.2.2(f) as a result of the discussion.

Consideration of other options

Legal Text Discussions

A Workgroup member suggested adding the legal text reference table (shared by the Proposer previously with the Workgroup which illustrated the changes made to OC2), to the Workgroup Consultation document. This would make it easier for the respondents to understand the suggested changes. The Proposer agreed and the document displaying the current version of OC2 next to the proposed OC2 text has been created, the hope being to assist readers who had not been part of the GC0164 process to assess changes against intended objectives. Details of the table can be found in **Annex 5**.

Draft legal text

The draft legal text for this change can be found in **Annex 4**.

What is the impact of this change?

Proposer’s assessment against Grid Code Objectives	
Relevant Objective	Identified impact
(a) To permit the development, maintenance, and operation of an efficient, coordinated, and economical system for the transmission of electricity This could make the operation of the system more efficient and also reduce operational costs for parties	Positive Users will find it quicker to find information, saving time in determining compliance requirements.
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate	Positive Ease of use of OC2 will allow more Users to understand OC2, encouraging new Users to

electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	enter the industry, promoting competition and encouraging innovative industry entrants.
(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Positive A more usable version of OC2 will make it easier for Users to implement their obligations correctly.
(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	Neutral [Please provide your rationale]
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive A more usable version of OC2 will make it easier for Users to implement their obligations correctly and for the ESO to administer the Grid Code. Establishing a streamlined modification process for code alignment, simplification and rationalisation will help deliver more wide-ranging efficiency improvements to the codes, including Energy Code Reform.

Proposer's assessment of the impact of the modification on the stakeholder / consumer benefit categories

Stakeholder / consumer benefit categories	Identified impact
Improved safety and reliability of the system	Positive Clearer obligations and easier implementation of them will help improve system reliability.
Lower bills than would otherwise be the case	Positive Lower Grid Code administration overheads across the industry will help to reduce bills.
Benefits for society as a whole	Neutral

Reduced environmental damage	Neutral
Improved quality of service	Positive Simplification of OC2 will result in more efficient use in complying with and understanding OC2.

Standard Workgroup consultation question: Do you believe that GC0164 Original proposal better facilitates the Applicable Objectives?

When will this change take place?

Implementation date

10 working days after an Authority decision.

Date decision required by

As soon as possible.

Implementation approach

There are no system changes required to change as a result of this modification.

Standard Workgroup consultation question: Do you support the implementation approach?

Interactions

- | | | | |
|---|------------------------------|--|--------------------------------|
| <input type="checkbox"/> Grid Code | <input type="checkbox"/> BSC | <input type="checkbox"/> STC | <input type="checkbox"/> SQSS |
| <input type="checkbox"/> European Network Codes | | <input type="checkbox"/> Other modifications | <input type="checkbox"/> Other |

How to respond

Standard Workgroup consultation questions

1. Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?
2. Do you support the proposed implementation approach?
3. Do you have any other comments?
4. Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?

Specific Workgroup consultation questions

5. Do you think that the changes proposed make it easier to understand than the existing version?
6. Do you agree that the Grid Code obligations wouldn't change if this version is implemented when comparing to the existing version?
7. Do you agree with the Workgroup view that there should be only one set of Glossary and Definitions applicable to the entire Grid Code?
8. Do you agree with the proposed change to move the position of the Generators Performance Charts from the Operating Code to the Planning Code?

9. In order to help quantify the industry resources required to implement this type of change, please indicate the number of hours spent reading and responding to this consultation.

The Workgroup is seeking the views of Grid Code Users and other interested parties in relation to the issues noted in this document and specifically in response to the questions above.

Please send your response to grid.code@nationalgrideso.com using the response proforma which can be found on the [GC0164 modification page](#).

In accordance with Governance Rules if you wish to raise a Workgroup Consultation Alternative Request, please fill in the form which you can find at the above link.

If you wish to submit a confidential response, mark the relevant box on your consultation proforma. Confidential responses will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel, Workgroup or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

Acronyms, key terms and reference material

Acronym / key term	Meaning
ASRW	Alignment, Simplification and Rationalisation Workstream
BSC	Balancing and Settlement Code
CMP	CUSC Modification Proposal
CUSC	Connection and Use of System Code
dWSTC	Digitalised Whole System Technical Code
ECR	Energy Codes Reform
ESO	Electricity System Operator
OC2	Operating Code No.2
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
T&Cs	Terms and Conditions

Reference material

- ¹ [The Grid Code](#)
- ¹ [Digitalised Whole System Technical Code](#)

Annexes

Annex	Information
Annex 1	Proposal Form
Annex 2	Terms of Reference
Annex 3	ASRW Considerations
Annex 4	Legal Text
Annex 5	Comparison Document