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STCP Modification Proposal Form

PM0144: Digital Communication System Integration

Overview: This modification seeks to remove references to “fax”, “facsimile”, and “email” from the STCPs in order to reflect both current and future methods of communication between relevant Users and the National Energy System Operator (NESO) due to the national decommissioning of the Public Switched Telephone Network (PSTN).

Modification process & timetable



Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on whether the modification should be implemented.

This modification is expected to have a: **Medium impact**

NESO, Transmission Owners

**Proposer's
assessment of
materiality**

Not a material change – STC Panel approval

**Who can I talk
to about the
change?**

Proposer:

Stuart McLarnon
Stuart.McLarnon@uk.nationalenergys
o.com

07596579914

Code Administrator Contact:

Deborah Spencer

Deborah.spencer@nationalenergyso.com

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What is the issue?

At present, the digital communication between Transmission Operators (TOs) and NESO relies solely on letters, faxes, and emails. NESO currently uses fax machines within the Electricity National Control Centre (ENCC) to send and receive data from Primary and some Secondary Balancing Mechanism Units (BMUs). A number of these data submissions from BMUs support critical functions such as System Restoration, by transmitting data such as Unit Availability. Fax machines are an ageing technology, with hardware support contracts ending (or have ended) and replacement parts difficult to source. The management of paper output is also time-consuming for reporting and audit purposes. There is significant reliance on sending sensitive data via emails but technology has advanced and there are now more efficient and secure digital communication systems available.

Why change?

Integrating other suitable forms of digital communication will enhance the exchange of information and data sharing between organisations and ensure sensitive information is appropriately protected. Additionally, it allows Users to use the most advanced technology currently available. Examples of the data types include but are not limited to:

Competency checks, Offer Acceptances, Counter signatures, Single Line Diagrams (SLDs), Transmission Owner Construction Offers (TOCOs), Sustainable Business Networks (SBNs), and Data Research Communications (DRC) data.

The Public Switched Telephone Network (PSTN) that fax machines use, is due to be switched off by the start of 2027,¹ which will cease all non-voice services that use this network. In readiness for the PSTN switch off, an alternative method of communication between relevant Users and NESO will need to be established to ensure current interactions can continue. It should also maintain the stability and audit trail that the current fax solution provides.

What is the proposer's solution?

While there is an option to upgrade existing faxes to utilise digital line technology (via a digital adapter), this still does not address the current issues with the use of faxes in terms of hardware support and paper management. With this in mind, we believe a

¹ <https://business.bt.com/why-choose-bt/insights/digital-transformation/uk-pstn-switch-off/>

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more future proof digital solution is required that provides the same functionality of the current fax solution but improves efficiencies and costs for Users.

The proposed solution, (to be defined under an “umbrella term” as the “Designated Information Exchange System”), will be an Azure based platform which will allow both Users and NESO to provide web form submissions and acknowledgements which are currently transmitted via fax through the use of paper forms, or a mutually agreed upon and secure digital information exchange system.

The platform will be accessed through the Users Internet Service Provider (ISP) via a secure, encrypted login which will be maintained and administered by NESO.

The platform will require no software licence obligations from the User and will be designed to be extendable to ensure any future requirements can be incorporated, and flexible to accommodate both existing and future Users.

It is proposed that a phased approach will be introduced following the implementation of the proposal with Users being moved across to the new platform over a period of time that will be agreed. The rationale for a phased approach is to ensure Users are fully comfortable with the use of the new platform prior to the phase out of fax machines.

The proposed new definition of the “Designated Information Exchange System”, will also include “facsimile” in order for the solution to accommodate the phased roll out of the platform from the implementation of the proposed changes where both the use of faxes and the platform will be in use. The definition will also include “...a mutually agreed upon digital information system”, to allow for alternatives to e-mail for data exchange between TOs and NESO.

Legal text

See Annex 1 which details the proposed changes across the relevant STCPs.

Proposer’s assessment against STC Objectives	
Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon Transmission Licensees by Transmission Licences and the Electricity Act 1989	Positive Moving to modern technology methods of data transfers and communication makes

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	the process more efficient and secure.
(b) efficient discharge of the obligations imposed upon the licensee by the Electricity System Operator licence, the Energy Act 2023 and Electricity Act 1989	Neutral
(c) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	Positive The proposal should create efficiencies in relation to communication between Users and NESO and replace outdated technologies.
(d) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity	Neutral
(e) protection of the security and quality of supply and safe operation of the National Electricity Transmission System insofar as it relates to interactions between Transmission Licensees and the licensee	Positive Technical experts have advised that this will allow us to use the most secure methods of data transfers for sensitive information
(f) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	Positive The change improves the efficiency of the administration by allowing more seamless transfer of data between the parties

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(g) facilitation of access to the National Electricity Transmission System for generation not yet connected to the National Electricity Transmission System or Distribution System	Neutral
(h) compliance with the Electricity Regulation and any Relevant Legally Binding Decisions of the European Commission and/or the Agency.	Neutral

Proposer's assessment against the STCP change requirements¹	Proposer's assessment
(a) the amendment or addition falls within the terms and arrangements set out in condition E4 of the ESO Licence Standard Condition B12 of the Transmission Licence; and	Requirement met
(b) the amendment or addition does not impair, frustrate or invalidate the provisions of the Code	Requirement met
(c) the amendment or addition does not impose new obligations or liabilities or restrictions of a material nature on Relevant Parties which are not subsidiary to the rights and obligations of the Relevant Parties under the Code	Requirement met
(d) the amendment or addition is not inconsistent or in conflict with the Code, ESO Licence or Transmission Licence Conditions or other relevant statutory requirements; and	Requirement met
(e) the Relevant Party Representatives deem that the amendment or addition is appropriate to support compliance with the Code	Requirement met

When will this change take place?

Implementation date

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10 working days after Authority decision date.

Implementation approach

It is proposed that a phased approach will be introduced following the implementation of the proposal with Users being moved across to the new platform over a period of time that we will be agreed. The rationale for a phased approach is to ensure Users are fully comfortable with the use of the new platform prior to the phase out of fax machines.

Interactions

☒ Grid Code ☐ BSC ☒ CUSC ☐ SQSS
☐ European Network ☒ Other ☐ Other
 Codes modifications

Changes will also be required to the CUSC (CMP443) and Grid Code (GC175) to reflect the changes that are being proposed to the STC Procedures in respect of the removal of references to Fax and Facsimile.

Panel Determination

Party	Determination
National Energy System Operator (NESO)	To be updated following Panel determination
National Grid (TO)	To be updated following Panel determination
Offshore Transmission Owners (OFTOs)	To be updated following Panel determination
Scottish Hydro Electric Transmission plc (SHET)	To be updated following Panel determination
SP Transmission Limited (SPT)	To be updated following Panel determination

Acronyms, key terms and reference material

Acronym / key term	Meaning
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BMU	Balancing Mechanism Units
BSC	Balancing and Settlement Code
CUSC	Connection and Use of System Code
DRC	Data Research Communications
EBR	Electricity Balancing Regulation
ENCC	Electricity National Control Centre
GC	Grid Code
GCDF	Grid Code Development Forum
ISP	Internet Service Provider
PM	Procedure Modification
PSTN	Public Switched Telephone Network
SLD	Single Line Diagrams
STC	System Operator Transmission Owner Code
SQSS	Security and Quality of Supply Standards
SBN	Sustainable Business Network
T&Cs	Terms and Conditions
TO	Transmission Owner
TOCO	Transmission Owner Construction Offer