

GC0112 'National Grid Legal Separation Grid Code changes to incorporate NGENSO' update



Grid Code Panel – 16 May 2018

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Background of Issue

- GC0112 decision request was: ‘The GC changes once approved will be introduced but “suspended”, apart from the “implementation/transitional” provisions in the Appendix to the General Conditions, until the transfer of the transmission licence to NGENSO’
- The codes, once amended for separation, can form the baseline for any mods going forward before the transfer helping to manage the interaction between this forward facing change and the fact that the codes are live documents and subject to ongoing open governance
- Post raising mod – Reviewed number of outstanding mods/legal text changes; risk of causing confusion for industry participants when using the GC

Background of Issue

Mod decisions before 1st Workgroup:

GC0100, GC0101 and GC0102

Post 1st Workgroup (29 May) before 2nd Workgroup (04/07) -

GC0099 (June 18)

Post 2nd Workgroup (04/07) before sending to Ofgem (22/08)

GC0098 (July/August 18)

After 22/08/2018 up to 01/04/2019:

GC0097 and GC0104 (Aug) GC0096 and GC0106 (Sept) GC0110 and GC0111 (Oct) GC0114 (Nov)

After 01/04/2019: Should use the new LSP text

GC0103, GC0105, GC0107/113, GC0108, GC0109

Potential Issues

- Incorrect legal text being issued for consultations
- Significant modification needed to be raised in Feb/March 2019
- Confusion for industry participants
- Additional legal resourcing – availability/cost
- Risk of human error when updating/ due to number of changes
- Potential two sets of legal text or two sets of Grid Code required to be published by the CA

Potential Solution

- Proposed solution (still requires approval within NG) raise a housekeeping/self governance modification at the June GC Panel to:
 - Change all 'NGET' terms to 'The Company' immediately
- This approach should significantly reduce the number of legal text changes in GC0112 and other mods
- Post approval of GC0112; other mods may need to use to use the two sets of legal text but the complexity should be significantly reduced

Query for Panel

- Appropriate approach?
- On the basis that we raise a modification at the June Panel for the name change from 'NGET' to 'The Company', would you view this as a 'housekeeping' or 'self-governance' modification?
- Note: May impact the timescales to develop GC0112

Clarification of terms

Self-Governance Criteria

A proposed Modification that, if implemented,

(a) is unlikely to have a material effect on:

(i) existing or future electricity consumers; and

(ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity; and

(iii) the operation of the National Electricity Transmission System; and

(iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and

(v) the Grid Code's governance procedures or the Grid Code's modification procedures, and

(b) is unlikely to discriminate between different classes of Users.

Clarification of terms

Fast Track Criteria

A proposed Grid Code Modification Proposal that, if implemented,

(a) would meet the Self-Governance Criteria; and

(b) is properly a housekeeping modification required as a result of some error or factual change, including but not limited to:

(i) updating names or addresses listed in the Grid Code;

(ii) correcting any minor typographical errors;

(iii) correcting formatting and consistency errors, such as paragraph numbering; or

(iv) updating out of date references to other documents or paragraphs