

GC0126

**Mod Title:** Implementing Profiled Stable Import and Export Limits, and reversing unimplemented aspects of GC0068

01	Proposal Form
02	Workgroup Consultation
03	Workgroup Report
04	Code Administrator Consultation
05	Draft Grid Code Modification Report
06	Final Grid Code Modification Report

**Purpose of Modification:** This modification aims to progress the Profiled Stable Import and Export Limits identified in the Cost Benefit Analysis carried out on BSC P297 and GC0068.



**The Proposer recommends that this modification should be:**

- subject to self-governance
- assessed by a Workgroup

This modification was raised 20 March 2019 and will be presented by the Proposer to the Panel on 28 March 2019. The Panel will consider the Proposer's recommendation and determine the appropriate route.



**High Impact:**

N/A









**Medium Impact**

National Grid Electricity System Operator and Elexon



**Low Impact**

Generators

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Timetable		 07785428175
<b>The Code Administrator recommends the following timetable:</b>		<b>Proposer:</b> Gregory Heavens
Initial consideration by Workgroup	May 2019	 Greg.Heavens@nation algrid.com
Workgroup Report presented to Panel	26 September 2019	 01189 363 522
Code Administration Consultation Report issued to the Industry	October 2019	<b>National Grid Representative:</b> Gregory Heavens
Draft Self Governance Report presented to the Grid Code Review Panel	28 November 2019	 Greg.Heavens@nation algrid.com
Appeal window	29 November 2019 – 20 December 2019	 01189 363 522
Implementation into the Grid Code	w/c 6 January 2020	

## Proposer Details

<b>Details of Proposer:</b> (Organisation Name)	National Grid ESO
Capacity in which the Grid Code Modification Proposal is being proposed: (e.g. CUSC Party)	The Company
<b>Details of Proposer's Representative:</b> Name: Organisation: Telephone Number: Email Address:	Gregory Heavens National Grid ESO +44 (0)1189 363 522 Greg.Heavens@nationalgrid.com
<b>Details of Representative's Alternate:</b> Name: Organisation: Telephone Number: Email Address:	Robert Wilson National Grid ESO 0192 665 3398 <a href="mailto:Robert.Wilson2@nationalgrid.com">Robert.Wilson2@nationalgrid.com</a>
<b>Attachments (Yes/No):</b> <b>If Yes, Title and No. of pages of each Attachment:</b>	

## Impact on Core Industry Documentation.

Please mark the relevant boxes with an "x" and provide any supporting information

<b>BSC</b>	<input checked="" type="checkbox"/>
<b>CUSC</b>	<input type="checkbox"/>
<b>STC</b>	<input type="checkbox"/>
<b>Other</b>	<input type="checkbox"/>

(Please specify)

National Grid ESO will be proposing a modification to the BSC to enable the publication of these Data items on BMRS.

# 1 Summary

## Defect

GC0068 and BSC P297 were raised in 2013 to take advantage of some of the expected functionality of the Electricity Balancing System (EBS). Certain aspects of GC0068, notably the Reactive and Frequency Report Fax Forms, were implemented following the Authority's Decision dated 3 March 2014. The remaining changes were to be implemented following the go-live of the EBS system.

Although the Scheduling component of EBS has now been implemented it is not certain when the additional functionality required to fulfil GC0068 and BSC P297 will be delivered.

To remove industry uncertainty regarding the delivery of these modifications we raised a BSC change (P373) which sought to remove the original P297 requirements from the BSC and we carried out a Cost Benefit Analysis (CBA) to assist Ofgem in coming to a decision.

Our CBA concluded that there were consumer benefits in implementing profiled Stable Import Limits (SIL) and Stable Export Limits (SEL) and a majority of the stakeholders that responded supported this.

## What

This Modification seeks to implement the time varying profiles SIL and SEL introduced in GC0068.

It will also reverse the unimplemented aspects of GC0068. The ESO will also raise a BSC issues group to consider these other aspects and whether they will derive a customer benefit. Further proposals will be brought forward if that process demonstrates a consumer benefit.

## Why

For more background on this modification please see the CBA published in January 2019, which can be found here:

[https://www.nationalgrideso.com/sites/eso/files/documents/NGESO%20P297-GC0068%20Cost%20Benefit%20Analysis%20Jan-19%20for%20publication\\_0.pdf](https://www.nationalgrideso.com/sites/eso/files/documents/NGESO%20P297-GC0068%20Cost%20Benefit%20Analysis%20Jan-19%20for%20publication_0.pdf)

## How

It is proposed to form a workgroup to ascertain if the legal text from GC0068 still delivers the intention of the modification on the changed Grid Code baseline.

## 2 Governance

### Justification for Self-Governance Procedures

GC0068 was previously approved by Ofgem for implementation, in our letter of the 20 February and as referenced in Ofgem's decision on BSC P373, we committed to raising modifications to the Grid Code and BSC to progress SIL and SEL. Ofgem has previously decided to implement profiled SIL and SEL within GC0068. We therefore propose that this modification proceeds as Self Governance.

Self-Governance - The modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- i. Existing or future electricity customers;
- ii. Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity;
- iii. The operation of the National Electricity Transmission System;
- iv. Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies;
- v. The Grid Code's governance procedures or the Grid Code's modification procedures.

### Requested Next Steps

This modification should:

- be subject to self-governance
- be assessed by a Workgroup

## 3 Why Change?

The Stable Import Limit (SIL) and Stable Export Limit (SEL) are currently both submitted as single static MW values.

GC0068 allows time varying profiles to be submitted.

In Grid Code, under BC2.5.3.1, it is stated that a submission of Dynamic Parameters from a BM Participant will take effect from time of receipt by National Grid. This statement was valid whilst the Dynamic Parameters consisted only of static point values. However, it would no longer apply to SEL and SIL which comprise submissions of time-varying profiles. GC0068 also removes the statement and replaces it with similar statements, within the introductions to Dynamic Parameters in BC2, explicitly indicating the SEL and SIL as exceptions.

## 4 Code Specific Matters

### Technical Skillsets

Grid Code Submissions, especially BC2 - Post Gate Closure Process

### Reference Documents

GC0068 Modification Report

<https://www.nationalgrideso.com/codes/grid-code/modifications/gc0068-grid-code-new-and-revised-unit-data-and-instructions>

BSC Modifications P297 and P373

<https://www.elexon.co.uk/mod-proposal/p297/>

<https://www.elexon.co.uk/mod-proposal/p373/>

GC0068 and P297 Cost Benefit Analysis

<https://www.nationalgrideso.com/document/135941/download>

Open letter: ESO approach following conclusion of the GC0068/P297 Cost Benefit Analysis and Ofgem decision on P373

<https://www.nationalgrideso.com/document/138371/download>

## 5 Solution

The solution for Profiled Stable Import and Export Limits has been developed in GC0068. It is proposed to form a workgroup to ascertain if the legal text from GC0068 still delivers the intention of the modification on the changed Grid Code baseline.

The legal text from GC0068 that does not relate to SIL and SEL, and has not already been implemented, will be reversed by this modification.

## 6 Impacts & Other Considerations

National Grid ESO will be proposing a modification to the BSC to enable the publication of these Data items on BMRS.

### Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This modification is not expected to impact an SCR.

### Consumer Impacts

The CBA carried out identified some benefits to consumers of implementing these changes. This is supported by stakeholder feedback received as part of the call for evidence. Set against a £700k ESO estimate of implementation cost we believe there is likely to be benefit in taking this change forward.

## 7 Relevant Objectives

### Impact of the modification on the Applicable 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	None
(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 electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Positive
(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;	None

(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	None
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	None

The introduction of time-varying SEL/SIL should have a positive impact on objective (b) as it allows certain types of BM Participants to better model their profiles thus reducing their exposure to imbalance charges and facilitating competition in the generation of electricity. The efficiency gains realised from the increased information available to NG ESO may facilitate reductions in balancing costs to market participants, thereby supporting competition in electricity generation and supply.

## 8 Implementation

As detailed in our open letter of the 20<sup>th</sup> of February, we are raising this modification to implement these changes by November 2020.

An indicative timeline can be found in Appendix 2 of the Open Letter.

## 9 Legal Text

Legal Text has been developed for this solution in the GC0068 workgroup, which is available on the NGESO website.

This Legal Text will be the basis of the proposal, a workgroup can ascertain if the legal text from GC0068 still delivers the intention of the modification on the changed Grid Code baseline.

## 10 Recommendations

### Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self Governance procedures should apply