At what stage is this document **Grid Code Modification Proposal Form** in the process? **Proposal Form** 01 GC0135 Workgroup 02 Consultation Mod Title: Removal of **Workgroup Report** 03 **Redundant Provisions** Code Administrator 04 Consultation **Draft Grid Code** 05 Modification Report **Final Grid Code** 06 Modification Report

Purpose of Modification: As a result of BSC Modification Proposal P394 raised by Elexon, this modification is being raised to remove some redundant provisions from the Grid Code. The BSC Modification if passed will render the references included within this proposal wholly obsolete.

The Proposer recommends that this modification should be:



- subject to self-governance procedure
- proceed to Code Administrator Consultation

This modification was raised 14 October 2019 and will be presented by the Proposer to the Panel on 29 October 2019. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact: None.



Medium Impact None.



Low Impact All parties.

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Timetable

The Code Administrator will update the timetable following Panel decision.

The Code Administrator recommends the following timetable:

Initial consideration by Workgroup	dd month year
Workgroup Consultation issued to the Industry	dd month year
Modification concluded by Workgroup	dd month year
Workgroup Report presented to Panel	dd month year
Code Administration Consultation Report issued to the Industry	dd month year
Draft Final Modification Report presented to Panel	dd month year
Modification Panel decision	dd month year
Final Modification Report issued the Authority	dd month year
Decision implemented in Grid Code	dd month year



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Proposer Details

	<u> </u>
Details of Proposer: (Organisation Name)	National Grid ESO
Capacity in which the Grid Code Modification Proposal is being proposed: (e.g. CUSC Party)	The Company
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Matt Baller National Grid ESO 07866 197 575 Matt.baller@nationalgrideso.com
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Attachments (Yes/No):	
If Yes, Title and No. of pages of each Attachment:	

Impact on Core Industry Documentation.

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

BSC X
CUSC
STC
Other

(Please specify)

We do not believe there will be any impact on the CUSC or STC as a result of this modification.

1 Summary

Defect

Balancing and Settlement Code (BSC) <u>Modification P394</u> proposes to remove references to **Quiescent Physical Notifications (inclusive of its abbreviated form "QPNs")** and **Joint BM Units** from the BSC. As a consequence, the use of these terms within the Grid Code will be rendered redundant and should be removed for clarity.

What

The proposed modification aims to amend the Grid Code to remove the terms **Quiescent Physical Notifications** and **Joint BM Units.** Further minor amendments are required to ensure continuity and consistency of language where applicable entries are deleted. Please see the proposed legal text (Section 9 of this report) for the list of proposed changes.

Why

The BSC modification P394 will remove references to **Quiescent Physical Notifications** and **Joint BM Units.** This is a consequential modification to remove these terms from the Grid Code avoid unnecessary confusion for market participants when reading the Grid Code.

How

All references to **Joint BM Units**, **Quiescent Physical Notifications** (including entries for "QPN" and "QPNs") will be removed from the Grid Code.

2 Governance

Justification for Self-Governance Procedure

As the proposed changes are not expected to be material (see section 3 below for the rationale), the Proposer believes that this modification can be considered under the self-governance modification route.

The Self-Governance route may be used where the modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- Existing or future electricity customers:
- Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,
- The operation of the National Electricity Transmission System

- Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies
- The Grid Code's governance procedures or the Grid Code's modification procedures

In addition, the proposer believes a workgroup is not necessary in this instance as this is a simple, non-contentious, consequential modification from a BSC change (P394).

Requested Next Steps

This modification should:

- Be subject to self-governance procedure
- Proceed to Code Administrator Consultation

3 Why Change?

The commentary below is quoted from BSC Proposal P394, outlining why the affected sections are to be removed from the BSC. This reasoning equally applies to the changes proposed within this modification in terms of why the proposed changes are immaterial.

Quiescent Physical Notifications (QPNs)

QPNs were introduced as part of the New Electricity Trading Arrangements (NETA) in March 2001, to facilitate Balancing Mechanism (BM) participation for units that contained both controllable and non-controllable assets. However, settlement and dispatch arrangements were never defined, and the Grid Code stipulates that QPN values must be zero. ELEXON is introducing new solutions for sites with controllable and uncontrollable loads through BSC Modification P375 – 'Behind the Meter' arrangements.

Joint BM Units

Joint BM Units were introduced as part of NETA to allow customers with Non-Half Hourly (NHH) Teleswitch meters to participate in the BM. In reality they were never fully implemented; the requirements for dispatching Joint BM Units were never agreed and, after discussions with National Grid ESO, no evidence has been found of such dispatch processes being developed or implemented. Joint BM Units can be registered with the Central Registration Agent (CRA), but this functionality has never been used.

4 Code Specific Matters

Technical Skillsets

An understanding of the structure of the relevant sections of Grid Code.

Reference Documents

The <u>Balancing and Settlement Code</u> (BSC), as BSC modification P394 is the basis for this modification proposal.

5 Solution

This modification will update the Grid Code with the changes outlined in Section 9 "Legal Text".

6 Impacts & Other Considerations

This modification is being raised alongside and in response to BSC modification proposal P394; the content of each proposal will directly impact in part on the other.

There are no wider impacts beyond the BSC and the Grid Code.

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

This modification does not impact on a current SCR.

Consumer Impacts

No consumer impacts are expected from this modification.

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	Neutral
(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);	Neutral
(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation,	Neutral

transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	
(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
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive

8 Implementation

We recommend that this modification is implemented as soon as possible after a decision on this modification has been made.

9 Legal Text

Text Commentary

The proposed changes remove the references to **Quiescent Physical Notifications** and **Joint BM Units** (including entries for "QPN" and "QPNs"). Where necessary, syntax, punctuation and grammar has then been considered and amended as necessary to ensure continuity and structural clarity.

This modification will update the Grid Code with the changes outlined in the following table:

Section	Defect	
Glossary & Definitions		
Emergency Instruction	Remove "QPN"	
Joint BM Unit Data	Remove entire reference	
Quiescent Physical Notification or QPN	Remove entire reference	
Introduction		
OC5.1(b)(ii)	Change to read "tests on BM Units , to ensure that the BM Units are available in accordance with their submitted Export and Import Limits , QPNs, Joint BM	

	Unit Da	ta-and Dynamic Parameters."	
Objective	Objective		
OC5.2(c)	declare Import	e to read "whether each BM Unit is available as d in accordance with its submitted Export and Limits, QPN, Joint BM Unit Data and ic Parameters ; and"	
Procedure for Testing – The Compa	ıny's Ins	truction for Testing	
OC5.5.1.2(a)	Mechai accorda Limits, Parame	e to read "if active in the Balancing nism, meets the ability to operate in ance with its submitted Export and Import QPN, Joint BM Unit Data and Dynamic eters and achieve its expected input or output as been monitored under OC5.4; and"	
OC5.5.1.3(c)	be initial accomp (in accomp (in accomp which he test was accorded OC5.5.*	e to read "The test referred to in OC5.5.1.1 will sted by the issue of instructions, which may be panied by a Bid-Offer Acceptance , under BC2 ordance with the Export and Import Limits , point BM Unit Data and Dynamic Parameters ave been submitted for the day on which the scalled, or in the case of a CCGT Unit , in ance with the parameters submitted under 1.3(b)). The instructions in respect of a CCGT thin a CCGT Module will be in respect of the Unit , as provided in BC2."	
Procedure for Testing – Test and Monitoring Assessment [Table entries listed under "Parameter to be Tested"]			
Export and Import Limits, QPN, Joint BM Unit Data and Dynamic Parameters Change to read: Export and Import Limit QPN, Joint BM Unit Data and Dynamic		Change to read: Export and Import Limits, QPN, Joint BM Unit Data and Dynamic Parameters	
The Export and Import Limits, QPN BM Unit Data and Dynamic Paramet under test are within 2½% of the declaration value being tested.	ters	Change to read "The Export and Import Limits, QPN, Joint BM Unit Data and Dynamic Parameters under test are within 2½% of the declared value being tested."	
Dispute Resolution			
OC5.6.2		Change to read "If a BM Unit fails the test, the User shall submit revised Export and Import Limits, QPN, Joint BM Unit Data and/or Dynamic Parameters, or in the case of a BM Unit comprising a Generating Unit, Power Generating Module, CCGT Module, HVDC Equipment, DC Converter, OTSUA (prior to the OTSUA Transfer Time) or Power Park Module, the User may amend, with The Company's approval, the relevant	

	registered parameters of that Generating Unit, Power Generating Module, CCGT Module, HVDC Equipment, DC Converter, OTSUA (prior to the OTSUA Transfer Time) or Power Park Module, as the case may be, relating to the criteria, for the period of time until the BM Unit can achieve the parameters previously registered, as demonstrated in a re-test."
Balancing Code No. 1 – Pre Gate Closure Process - Contents	
BC1.A.1.2 Quiescent Physical Notifications (QPN)	Remove contents table entry
Day Ahead Submissions	
BC1.4.2(b)	Remove entire entry
BC1.4.2(e)	Para.2, change to read "These Dynamic Parameters shall reasonably reflect the expected true operating characteristics of the BM Unit and shall be prepared in accordance with Good Industry Practice. In any case where non-zero QPN data has been provided in accordance with BC1.4.2(b), the Dynamic Parameters will apply to the element being offered for control only, i.e. to the component of the Physical Notification between the QPN and the full level of the Physical Notification."
BC1.4.2(g)	Remove entire entry
Receipt Of BM Unit Data Prior To Gate Clos	ure
BC1.4.4 BC1.4.5	Para.2, change to read "For the avoidance of doubt, no changes to the Physical Notification, QPN data or Bid-Offer Data for any Settlement Period may be submitted to The Company after Gate Closure for that Settlement Period." Para.1, change to read "In the event that no authorization of any areal of the PM Unit Data.
	submission of any or all of the BM Unit Data and Generating Unit Data in accordance with BC1.4.2 in respect of an Operational Day, is received by The Company by 11:00 hours on the day before that Operational Day, The Company will apply the Data Validation, Consistency and Defaulting Rules, with the default rules applicable to Physical Notifications, Quiescent Physical Notifications and Export and Import Limits data selected as follows:"
Appendix 1 – BM Unit Data	
BC1.A.1.2 Quiescent Physical Notifications (QPN)	Remove entire section.

Balancing Code No.2 – Post Gate Closure Process (Contents)	
BC2.8.2	Change to read "Consistency With Export And Import Limits, Qpns And Dynamic Parameters"
Information Used	
BC2.4.1(d)(b)	Change to read "Export and Import Limits, QPNs, and Joint BM Unit Data in respect of that BM Unit and/or Generating Unit supplied under BC1 (and any revisions under BC1 and BC2 to the data); and"
Revisions to BM Unit Data	
BC2.5.3	Change to read "Following Gate Closure for any Settlement Period, no changes to the Physical Notification, to the QPN data or to Bid-Offer Data for that Settlement Period may be submitted to The Company."
Bid-Offer Acceptances	
BC2.7.1	Change to read "Bid-Offer Acceptances may be issued to the Control Point at any time following Gate Closure. Any Bid-Offer Acceptance will be consistent with the Dynamic Parameters, QPNs, Export and Import Limits, and Joint BM Unit Data-of the BM Unit in so far as the Balancing Mechanism timescales will allow (see BC2.7.2)."
BC2.7.1(b)	Change to read "Bid-Offer Acceptances sent to the Control Point will specify the data necessary to define a MW profile to be provided (ramp rate break-points are not normally explicitly sent to the Control Point) and to be achieved consistent with the respective BM Unit's Export and Import Limits, QPNs and Joint BM Unit Data provided or modified under BC1 or BC2, and Dynamic Parameters given under BC2.5.3 or, if agreed with the relevant User, such rate within those Dynamic Parameters as is specified by The Company in the Bid-Offer Acceptances."
BC2.7.2	Change title to read "Consistency With Export And Import Limits, QPNs And Dynamic Parameters"
BC2.7.2(a)	Change to read "Bid-Offer Acceptances will be consistent with the Export and Import Limits, QPNs, and Joint BM Unit Data provided or modified under BC1 or BC2 and the Dynamic Parameters provided or modified under BC2. Bid-Offer Acceptances may also recognise Other Relevant Data

	provided or modified under BC1 or BC2"
BC2.7.2(b)	provided or modified under BC1 or BC2" Change to read "In the case of consistency with Dynamic Parameters this will be limited to the time until the end of the Settlement Period for which Gate Closure has most recently occurred. If The Company intends to issue a Bid-Offer Acceptance covering a period after the end of the Settlement Period for which Gate Closure has most recently occurred, based upon the then submitted Dynamic Parameters, QPN's, Export and Import Limits, and Bid-Offer Data and Joint BM Unit Data applicable to that period, The Company will indicate this to the BM
	Participant at the Control Point for the BM
BC2.7.3(b)	Unit." [Retain remainder of paragraph as-is] Change to read "because they are not consistent with the Export and Import Limits, QPNs, or Dynamic Parameters or Joint BM Unit Data applicable at the time of issue of the Bid-Offer Acceptance."
Ancillary Services	
BC2.8.2 [Title]	Change title to read "Consistency With Export And Import Limits, QPNs and Dynamic Parameters"
BC2.8.2	Change to read "Ancillary Service instructions will be consistent with the Export and Import Limits, QPNs, and Joint BM Unit Data provided or modified under BC1 or BC2 and the Dynamic Parameters provided or modified under BC2. Ancillary Service instructions may also recognise Other Relevant Data provided or modified under BC1 or BC2."
BC2.8.3(a)	Change to read "Ancillary Service instructions may only be rejected, by automatic logging device or by telephone, on safety grounds (relating to personnel or plant) or because they are not consistent with the applicable Export and Import Limits, QPNs, Dynamic Parameters, Joint BM Unit Data, Other Relevant Data or data contained in the Ancillary Services Agreement and a reason must be given immediately for non-acceptance."
Emergency Circumstances	· ·
BC2.9.1.3	Change to read "In the case of BM Units and Generating Units in Great Britain, Emergency Instructions will be issued by The Company direct to the User at the Control Point for the BM Unit or Generating Unit and may require an action or response

BC2.9.3.1	which is outside its Other Relevant Data, QPNs, or Export and Import Limits submitted under BC1, or revised under BC1 or BC2, or Dynamic Parameters submitted or revised under BC2." Change to read "In the case of a BM Unit or a Generating Unit, Emergency Instructions may include an instruction for the BM Unit or the Generating Unit to operate in a way that is not consistent with the Dynamic Parameters, QPNs and/or Export and
	Import Limits."
Schedule 8 – Data Supplied by BM Participants [Table Entries]	
BC1 Quiescent Physical Notifications	Remove entire entry
BC1 Joint BM Unit Data	Remove entire entry

10 Recommendations

Proposer's Recommendation to Panel

- Agree that Self Governance procedures should apply
- Go straight to Code Administrator Consultation. Panel may prefer to refer this
 proposal to a Workgroup to allow line-by-line checking of the legal text but it is
 proposed that this could instead be carried out by circulation prior to the CAC being
 issued since the provisions being removed from the code are unused and their
 removal will have zero impact.