

Code Administrator Meeting 5 Summary

GC0134 Removing the telephony requirements for small, distributed and aggregated market participants who are active in the Balancing Mechanism.

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Key areas of discussion

Introduction

Workgroup members were reminded of previous discussions and where this modification had reached in the governance process

Consultation Responses

Phil Smith summarised the 4 consultation responses that had been received. The summary can be seen in the table below:

NGESO	EDF	ADE	SPEN
Potentially supportive, subject to security of supply risks being addressed, and regular review of thresholds	Potentially supportive, subject to cost benefit analysis and impact on security of supply being addressed	Fully supportive	Supportive in principle but have concerns over security of supply

Considerations from Workgroup Consultation responses and previous Workgroup discussions

The workgroup addressed some main questions and topics that had arisen from the previous workgroup meetings and consultation responses. The purpose of addressing each item was to be able to progress effectively and make best use out of the workgroup time. The main topics to address are listed below, along with a summary of the outcome from discussions:

What backup measures would apply for contingency operation outside office hours? (BAU, emergency & safety situations)

The workgroup discussed several options:

1. The generator must contract out its outside of office hours (ie outside 0800-1800) telephony to a DNO / aggregator / third party.
2. When it's uncontactable, a Generator must adhere to its Physical Notification (PN), which is a requirement of Grid Code. It would be accepted as a risk that the generator can't be contacted outside the hours 0800-1800 at times when electronic comms are offline.
3. During the period outside of office hours (ie outside 0800-1800), when Control and/or System Telephony is not staffed, an alternative contact number must be provided, such that there is still a 24/7 telephone contact between the ENCC and the generator in the event that an instruction has not been enacted via automatic logging devices (ie EDL or API) .

A fourth option was discussed, but the workgroup did not consider this to be an appropriate solution to pursue:

4. Maximum Export Limit (MEL) must be set to zero outside the hours 0800-1800, i.e. the BMU is not permitted to generate when they don't have fixed telephony coverage. This was

Cost Benefit Analysis (CBA) and regular review of threshold

SPEN, EDF and ESO all stated that their support for GC0134 would be subject to the CBA and analysis of the proposed thresholds. National Grid ESO took an action to address this and provide an update ahead of the next workgroup meeting to allow members time to reflect on the outcome.

Proposed thresholds for exemption from 24/7 telephony

The proposed thresholds of 10MW per site and 50MW per Control Point were discussed. Participants whose Registered Capacity was below the threshold would not be required to operate telephony at their control point outside of UK office hours, unless they are required to be part of other agreements or obligations. The proposer took an action previously to provide a benefit analysis and justification for this. Also to find out the cost of contracting a third party out of hours telephony service.

Will the GC0134 solution apply only to users joining the BM after implementation, or will it also apply retrospectively?

The workgroup felt that the solution applied below specified MW thresholds, then it could potentially apply retrospectively, given that there are currently no aggregators below the 50MW threshold, and only four BMU's below the 10MW threshold with a combined capacity of approximately 15MW, and therefore no risk of many existing generators choosing to reduce their telephony coverage to office hours only.

Interaction with GC0143 (Last resort disconnection of Embedded Generation)

This query was raised by EDF. The workgroup discussed if there was any interaction with this urgent modification. The members concluded that this would be covered by addressing the following in the Code Administrator Consultation:

- GC0143 is designed for non-BM participants who NG ESO don't have contact with. GC0134 could lead to there being BM participants who don't have 24/7 Control or System Telephony, however the benefit of them being in the BM and having EDL/EDT comms with the ENCC would outweigh the risk that they don't have Control / System Telephony outside the hours of 0800 – 1800.

- It is unlikely DNOs would be issuing instructions by phone during the emergency circumstances that GC0143 would apply to, particularly for the very small generators. They are likely to be disconnected via switching script.
- NGENSO will consider the GC0143 enduring solution that is currently in development, when reviewing the GC0134 thresholds in the future.

The workgroup were satisfied with this approach.

Interaction with GC0117

This was raised by NG ESO. It was proposed to address this query as follows:

GC0117 is unlikely to have an impact as the lowest threshold between Large and Small Power Stations is set at 10MW, though it is possible (albeit it unlikely) that this could change.

GC0134 is likely to finish before GC0117, so depending on the solution, this may need to be a consideration in any regular reviews of the GC0134 solution and thresholds if applicable.

Workgroup members were satisfied with this approach.

Consider impact on other NGENSO services (Fast Reserve / Frequency Response / STOR)

This was raised by SPEN as a query. NG ESO provided the following explanation:

1. Mandatory services (Reactive Power and Frequency Response)
No impact for GC0134, because these services are only mandatory above 10MW in Grid Code (per module i.e. lower level than site).
2. Non-mandatory commercial arrangements: e.g. ODFM.
The participant would have to meet the requirements for that service regardless of any potential GC0134 threshold.

It was noted that SPEN had been contacted by NG ESO with the above explanation and were satisfied.

Consider the relationship between Demand Aggregation and Generation Aggregation

The workgroup discussed if the proposed solution would also apply / work for Demand Aggregators. It was noted that it would likely be applicable too.

Potential impact on relationship with NGENSO

This query was raised in SPENs consultation response. Whilst there would be some dialogue by phone between ENCC and generators, this is fairly limited, so NG ESO do not believe this is a material consequence and have spoken to SPEN who are satisfied with this response.

How would the solution be applied in legal text?

There needs to be further development on the legal text at this stage so it was noted that NG ESO would take the action to come up with a plan to circulate to members, prior to the next workgroup meeting.

Conclusion

The workgroup agreed that the actions below should be progressed, with a view to working towards a solution at the next workgroup meeting.

Action Log

Number	Action Owner	Action	Delivery Date
1.	Peter Dennis	To produce benefit and justification for 10MW. Also consider the option / cost of contracting out of hours telephony.	TBC – confirmed with workgroup members once next meeting date confirmed
2.	John Walsh	To quantify the risk of EDL failure (in relation to 12 hrs per year question – see above in workgroup summary)	TBC – confirmed with workgroup members once next meeting date confirmed
3.	Phil Smith	Phil to speak to Tony in regards to legal text and provide a plan of action to workgroup	TBC – confirmed with workgroup members once next meeting date confirmed
4.	Phil Smith	To look at the rationales of the proposed thresholds	TBC – confirmed with workgroup members once next meeting date confirmed

Participants

Attendees	Company	Position
Nisar Ahmed	Code Administrator National Grid ESO	Chair
Kirsten Shilling	Code Administrator National Grid ESO	Technical Secretary
Peter Dennis	Ecotricity	Proposer and Workgroup Member
Phil Smith	National Grid ESO	Workgroup Member
Tony Johnson	National Grid ESO	Workgroup Member

Mark Bingham	National Grid	Workgroup Member
John Walsh	National Grid	Workgroup Member
Andrew Colley	EDF	Workgroup Member alternate to Garth Graham
Robert Longden	Cornwall Energy	Workgroup Member
Ben Godfrey	Western Power	Workgroup Member
Alastair Frew	Drax	Workgroup Member

For further information, please contact the Code Administrator.