

**STCP Modification Proposal Form**

**PM0130XXX:**  
**Housekeeping changes to simplify FSO transition**

**Overview:** This modification makes minor housekeeping changes to all of the current STCPs which will make a future change to implement transition to an independent Future System Operator much simpler.



**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: Low impact**

This modification by itself changes no obligations on any parties and is simply a change in drafting style.

<p><b>Who can I talk to about the change?</b></p>	<p><b>Proposer:</b>          Rob Wilson          Robert.wilson2@nationalgrideso.com          07799656402</p>	<p><b>Code Administrator Contact:</b>  <a href="#">Milly Lewis</a>  <a href="mailto:Milly.Lewis@nationalgrideso.com">Milly.Lewis@nationalgrideso.com</a>  <a href="tel:07811036380">07811036380</a></p>
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## What is the issue?

The Energy Bill that is currently progressing through parliament proposes to establish a Future System Operator (known in the Bill as the Independent System Operator and Planner or ISOP), an independent, first of a kind body, acting as a trusted voice at the heart of the energy sector. To do this will mean establishing the FSO as a new public body rather than the existing arrangements in which the Electricity System Operator licensed role is fulfilled by the National Grid Electricity System Operator Limited (NGESO). To facilitate this change will require amendments to all of the industry codes; many of these changes will be institutional (updating names and references) but some may be related to new roles for the FSO.

## Why change?

To maintain functionality of the codes will require changes to reference the new FSO company as the holder of the licence for electricity system operation once the name of this business is known and the licence(s) required for the FSO's licensed activities are granted.

In the interim, this proposal is for minor housekeeping changes to the STCPs to make the FSO transition simpler to implement when required. While these changes do not by themselves change the obligations on any STC parties, carrying them out now achieves the vast majority of the amendments required for the FSO transition by simply adopting a different style of referencing in the code. It will help to smooth transition, limit what would otherwise be a very high volume of work in implementing changes and will greatly aid baselining issues that will otherwise be encountered.

## What is the proposer's solution?

It is proposed to change references to NGESO in the body of each STCP to instead refer to 'The Company.' The ~~frontsheet~~[front sheet](#) and revision schedule of each STCP will also be updated to reference 'The Company' which is a new defined term included in the accompanying STC change CM XXX and sets out that 'The Company' currently means the National Grid Electricity System Operator Limited.

This will make the institutional change required to facilitate a future transition to the FSO much simpler as the majority of this will then be realised through a further amendment to this definition in the STC only to refer to the new name for the FSO when this is determined. For the STCPs, minimal further changes will be required as this change in referencing will apply automatically through their use of STC definitions.

Note that this use of 'The Company' defined term is identical to the long-standing treatment in the CUSC and that adopted in the Grid Code during the legal separation of NGESO from National Grid as part of a housekeeping modification made to the Grid Code prior to the actual implementation of legal separation, GC0115. During legal separation this approach was not adopted in the STC or STCPs as a minimum change approach was instead used to change, where relevant, references to NGET (National Grid Electricity Transmission) to NGESO.

An initial discussion at the February 2023 STC panel meeting was positively received by panel members although they did note that familiarity with the term 'The Company' could be more of a concern in the STCPs since these are used as working documents. An amendment was made to the proposed text in the STCPs to mitigate this risk as explained in more detail below, although it was noted that a change of name to

implement the FSO is unavoidable and that use of 'The Company' has already been established in the CUSC and Grid Code without adverse effects.

### **Legal text**

Attached. Following discussion at the March 2023 STC panel, a further clarification has been added to the proposed legal text in each STCP to improve familiarity with the term 'The Company' and to aid in reading the STCPs. This is as follows for an example drawn from STCP01-1 Operational Switching:

*1.1.1 In the Control Phase, appropriate co-ordination between **NGESO The Company, as defined in the STC and meaning the licence holder with system operator responsibilities**, Onshore and Offshore TOs and Affected Users is essential during the Operational Switching process. This document specifies the responsibilities of **NGESO The Company** and TOs in relation to Operational Switching of Plant and/or Apparatus on the TOs' Transmission Systems and the procedures to be followed by each Party.*

References to NGESO as the party with system operator functionality/responsibility or as the System Operator licensee (or similar) are made already in various places in the STC and STCPs so this is not a novel approach.

All of the current STCPs have been updated as listed in the table presented in appendix A which is an extract from Schedule 2 of the STC. This table also notes, for information, those documents in which very limited further changes will be required as part of the FSO implementation. These changes are to consider establishing an amended outage prefix in TOGA for the FSO (STCP11-2), to amend specific licence references (STCP11-4), and to amend the signature lines and titles in the example letters and proformas set out in STCPs 19-3, 19-4 and 19-5 to incorporate the new name of the FSO when this is determined.

## **What is the impact of this change?**

<b>Proposer's assessment against STC Objectives</b>	
<b>Relevant Objective</b>	<b>Identified impact</b>
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	<b>Neutral</b>
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	<b>Neutral</b>
(c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity	<b>Neutral</b>
(d) 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	<b>Neutral</b>

(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC	<b>Positive</b> This housekeeping change will improve the efficiency of future modifications to achieve set-up of the FSO
(f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;	<b>Neutral</b>
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	<b>Neutral</b>

Proposer's assessment against the STCP change requirements <sup>1</sup>	Proposer's assessment
(a) the amendment or addition does not impair, frustrate or invalidate the provisions of the Code	Requirement met
(b) 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
(c) the amendment or addition is not inconsistent or in conflict with the Code, Transmission Licence Conditions or other relevant statutory requirements	Requirement met
(d) 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

April 2023

### Implementation approach

Note that a modification proposal [CM030-XXX] has been raised to make associated changes to the STC. As the use of the 'The Company' definition is enabled by this then the implementation of CM030-XXX and the changes to STCPs set out in this modification PM-~~X0130XX~~ should be coordinated.

<sup>1</sup> STCP changes may only be made if they meet the requirements in Section B, 7.3.2



**Interactions**

- Grid Code
- European Network Codes
- BSC modifications
- Other modifications
- CUSC
- Other
- SQSS

[Explain how this modification interacts with other codes, industry documents, modifications or industry projects.]

**Panel Determination**

Party	Determination
<b>National Grid (ESO)</b>	To be updated following Panel determination
<b>National Grid (TO)</b>	To be updated following Panel determination
<b>Offshore Transmission Owners (OFTOs)</b>	To be updated following Panel determination
<b>Scottish Hydro Electric Transmission plc (SHET)</b>	To be updated following Panel determination
<b>SP Transmission Limited (SPT)</b>	To be updated following Panel determination

**Acronyms, key terms and reference material**

Acronym / key term	Meaning
BSC	Balancing and Settlement Code
PM	Procedure Modification
CUSC	Connection and Use of System Code
STC	System Operator Transmission Owner Code
STCP	System Operator Transmission Owner Procedures
SQSS	Security and Quality of Supply Standards

**Reference material**

- Grid Code modification GC0115: <https://www.nationalgrideso.com/codes/grid-code/modifications/gc0115-legal-separation-housekeeping-nget-company>

**Appendix A: STCP List – with change requirements**

Number	Title	Current Issue	Effective Date	Further change reqd for FSO	Detail of further FSO change
STCP 01-1	Operational Switching	Issue 009	01 April 2019	No	
STCP 02-1	Alarm and Event Management	Issue 006	01 April 2019	No	
STCP 03-1	Post Event Analysis and Reporting	Issue 006	01 April 2019	No	
STCP 04-1	Real Time Data Change Management	Issue 006	01 April 2019	No	
STCP 04-2	Real Time Datalink Management	Issue 006	01 April 2019	No	
STCP 04-3	Real Time Data Provision	Issue 007	01 August 2019	No	
STCP 04-4	Provision of Asset Operational Information	Issue 005	01 April 2019	No	
STCP 04-5	Operational Telephony	Issue 006	01 April 2019	No	
STCP 04-6	Offshore Datalink Functional Specification	Issue 003	01 April 2019	No	
STCP 06-1	Black Start	Issue 006	01 April 2019	No	
STCP 06-2	De-synchronised Island Management	Issue 005	01 April 2019	No	
STCP 06-3	System Incident Management	Issue 005	01 April 2019	No	
STCP 06-4	Contingency Arrangements	Issue 005	01 April 2019	No	
STCP 08-1	Protection Testing	Issue 005	01 April 2019	No	
STCP 08-2	Circuit Live Trip and DAR Tests	Issue 006	01 April 2019	No	
STCP 08-3	Operational Tests and System Tests	Issue 005	01 April 2019	No	
STCP 08-4	User Tests	Issue 005	01 April 2019	No	
STCP 09-1	Safety Co-ordination between Parties	Issue 006	01 April 2019	No	
STCP 09-2	Public and Site Safety	Issue 006	01 April 2019	No	
STCP 10-1	Asset Nomenclature	Issue 005	01 April 2019	No	
STCP 11-1	Outage Planning	Issue 007	01 April 2019	No	
STCP 11-2	Outage Data Exchange	Issue 007	01 April 2019	TBC	Consider establishing an amended outage prefix in TOGA for the FSO
STCP 11-3	TO Outage Change Costing	Issue 005	01 April 2019	No	
STCP 11-4	Enhanced Service Provision	Issue 002	01 April 2021	Yes	Amend specific licence references
STCP 12-1	Data Exchange Mechanism	Issue 005	01 April 2019	No	
STCP 13-1	Invoicing and Payment	Issue 0011	01 July 2021	No	
STCP 13-2	SIF and LARF Methodology	Issue 002	01 April 2019	No	
STCP 14-1	Data Exchange for Charge Setting	Issue 011	01 July 2021	No	
STCP 14-2	Data Requirements for Charging Consultations	Issue 004	01 April 2019	No	
STCP 14-3	Customer Charging Enquiries	Issue 004	01 April 2019	No	
STCP 16-1	Investment Planning	Issue 006	01 April 2019	No	
STCP 17-1	Feasibility Study	Issue 004	01 April 2019	No	

STCP 18-1	Connection and Modification Application	Issue 0010	31 December	No	
STCP 18-2	Use of System Application	Issue 005	13 May 2019	No	
STCP 18-3	TEC Changes	Issue 009	13 May 2019	No	
STCP 18-4	Request for a Statement of Works	Issue 005	13 May 2019	No	
STCP 18-6	Variation to Agreements	Issue 006	13 May 2019	No	
STCP 19-2	Construction Process and Scheme Closure	Issue 006	01 April 2019	No	
STCP 19-3	Operational Notification & Compliance Testing	Issue 008	1 August 2019	Yes	Update signature lines and titles in example letters
STCP 19-4	Commissioning and Decommissioning	Issue 007	01 April 2019	Yes	Update signature lines and titles in example letters and certificate proformas
STCP 19-5	Offshore Transmission System Compliance Process & Testing	Issue 005	24 June 2022	Yes	Update signature lines and titles in example letters
STCP 19-6	Application Fee	Issue 007	29 October 2020	No	
STCP 20-1	Electricity Ten Year Statement	Issue 005	01 April 2019	No	
STCP 21-1	Network Options Assessment	Issue 004	01 April 2019	No	
STCP 21-2	Network Asset Risk Metric (NARM) Data	Issue 001	03 February	No	
STCP 22-1	Production of Models for GB System Planning	Issue 003	23 March 2017	No	
STCP 23-1	Offshore Party Entry Process	Issue 002	01 April 2019	No	
STCP 24-1	Revenue Forecast Information Provision	Issue 005	01 July 2021	No	
STCP 25-1	Significant Code Review Process	Issue 002	01 April 2019	No	
STCP 25-2	Send Back Process	Issue 002	01 April 2019	No	
STCP 25-3	Fast Track Self Governance Process	Issue 002	01 April 2019	No	
STCP 26-1	Active Network Management	Issue 002	01 April 2019	No	
STCP 27-1	System Performance Monitoring Requirements	Issue 002	01 April 2019	No	