

# GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of Power Station requirements

**13 September 2023**

**Online Meeting via Teams**



# WELCOME



# Agenda

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## Topics to be discussed

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Welcome

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Objectives and timeline

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Actions review

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Discussion on existing interactions between NGESO have with embedded generation in north Scotland where the Small – Large threshold is 10MW

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Legal Text

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Terms of Reference Review

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Workgroup Report

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Any Other Business

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Next Steps

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# Workgroup Membership

Role	Name	Company
Proposer	Garth Graham	SSE
Workgroup Member	Mike Kay	Electricity North West
Workgroup Member	Richard Woodward	National Grid Electricity Transmission (NGET)
Workgroup Member	Chris Marsland	AMPS
Workgroup Member	Isaac Gutierrez	Scottish Power Renewables
Workgroup Member	Graeme Vincent	SP Energy Networks
Workgroup Member	Alan Creighton	Northern Powergrid
Workgroup Member	Richard Wilson	UK Power Networks
Work Group Member	Paul Youngman	Drax
Work Group Member	Antony Johnson	National Grid ESO
Workgroup Member	John Lucas	Elexon
Workgroup Member	Tim Ellingham	RWE
Workgroup Member	Andrew Akani	Western Power Distribution
Workgroup Member	Roddy Wilson	SHE Transmission
ESO Rep	David Halford	NGESO

# Code Modification Process Overview



## Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared - Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

## Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives

# Terms of Reference

## Workgroup Term of Reference

- a) Implementation and costs;
- b) Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text;
- c) Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report
- d) Consider EBR implications
- e) The current transmission and generation characteristics in Scotland compared to those in England and Wales and whether the rationale for the thresholds being set at the current levels still applies given the current and projected generation composition and transmission infrastructure;
- f) Cross code impacts (BSC, CUSC and DCode) and impact on EBR;
- g) Consider any emerging thinking from the Open Network project;
- h) Any interaction with generator licencing thresholds or requirements;
- i) The impacts for stakeholders including NGESO, iDNOs, TOs, DNOs and generators;
- j) Implications for new connectees in relation to data exchange, planning, market engagement and any other areas of change;
- k) The implications associated with implementing any changes retrospectively so that they apply to existing connectees rather than just for new connectees; and
- l) The implementation options together with the associated costs and benefits.

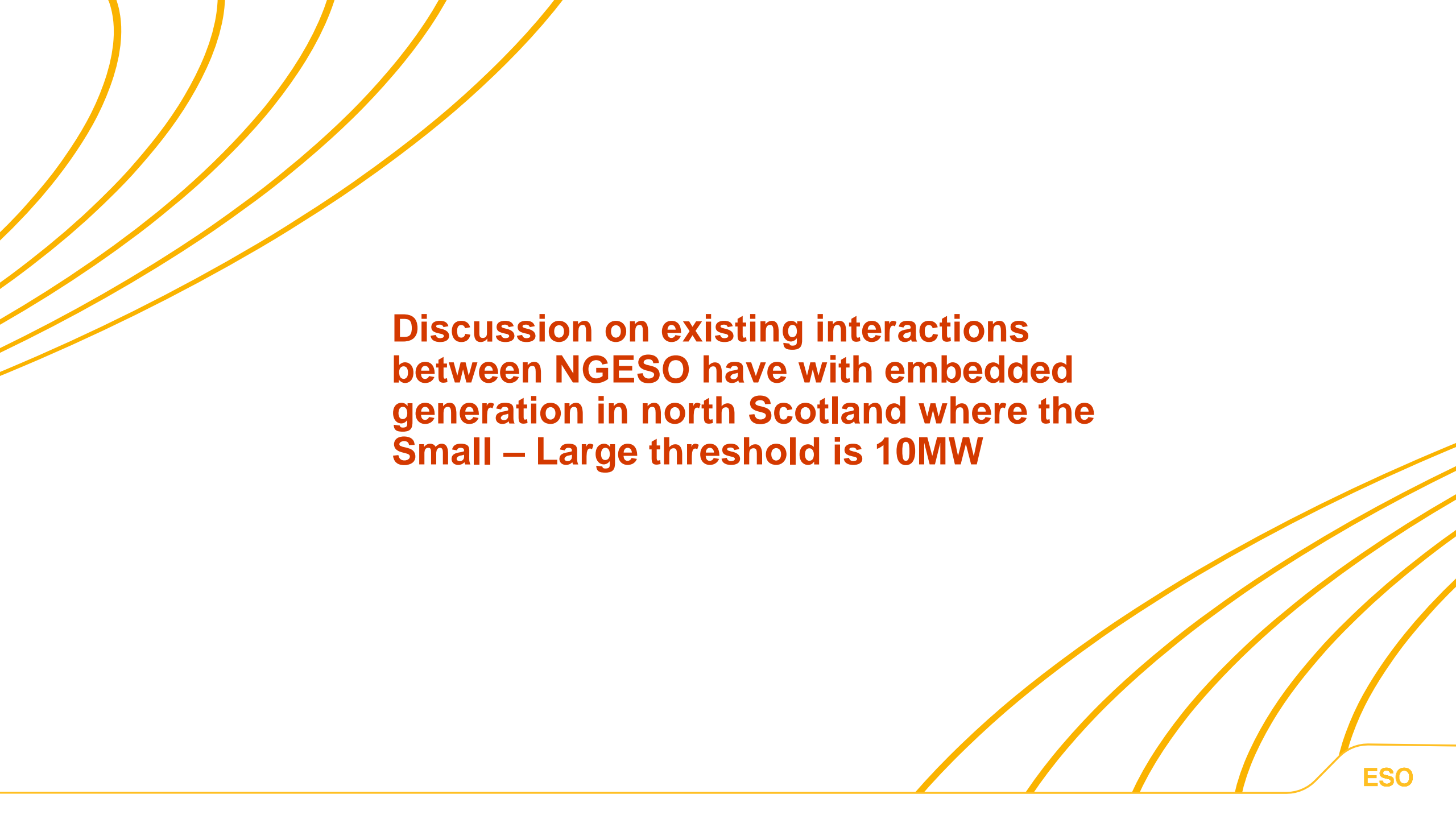
## Timeline for GC0117

Stage	Dates
Workgroup 20	13/09/2023
Workgroup 21	04/10/2023
Workgroup Report to Panel	18/10/2023
Post Workgroups	
Code Administrator Consultation	30/10/2023 - 30/11/2023
Draft Final Modification Report to Panel	17/01/2024
Final Modification Report to Panel to check Votes	29/01/2024
Final Modification to Ofgem / Appeals Window opened	06/02/2024
Implementation Date	TBC



# Action Review

Action number	Workgroup Raised	Owner	Action	Comment	Status
70	WG16	DD/DH	Updated action: Investigate potential cost impact on industry from this modification  Previous wording: Layout what the CBA is seeking to address against the aims of the modification; the costs that will flow from the changes to industry parties	Awaiting information from FES team regarding the potential number of extra generators falling under the 10MW proposal	Open
79	WG18	GG/TJ /JL/DH	Discuss with Ofgem whether any consequential modifications need to be presented at the same time as GC0117 or can follow after a decision has been made on the Grid Code modification.	N/A	Propose to close as Ofgem have agreed to make their decision on GC0117 ahead of receiving further modifications
84	WG19	TJ/MK	Review and confirm loss of mains requirements for above 10MW	N/A	Propose to close as no Loss of Mains Protection obligations for Generators in the Grid Code (see Workgroup Papers)
85	WG19	TJ/MK	Ensure likely impacts to G99 are captured	Additional detail to be added to the within 'Related Potential Modifications Outside the Scope of GC0117' section of the Workgroup Report	Propose to close captured within in the Workgroup Report.
86	WG19	TJ/MK	Discuss generator compliance with legal	Once a decision has been made on GC0117 a separate workgroup would need to be established to pick up the compliance elements to ensure efficiency and transparency. This would need the correct representation which is currently out of scope of GC0117.	Propose to close as Compliance would be unchanged by GC0117 other than in respect of lowering the threshold (ESO would still pick up compliance for Large Power Stations with the new thresholds).



**Discussion on existing interactions  
between NGE SO have with embedded  
generation in north Scotland where the  
Small – Large threshold is 10MW**

Summary of the feedback from the head of SSEN's Network Control Centre in relation to the interaction that NGESO have with embedded generation in north Scotland where the Small – Large threshold is 10MW:

- a) There is a lack of visibility of NGESO contractual arrangements (Grid Code arrangements and/or services such as STOR etc)
- b) There is a lack of visibility of the instructions NGESO issue to BM generators connected to the distribution network networks and hence a lack of opportunity to assess the impact these may have.
- c) There are various data flows that the Network Management Control get involved in as a go-between NGESO and BM generators.
- d) As the threshold is 10MW the volume of connections that are impacted as above can be material.
- e) Their view is that there would be an inappropriate impact on the management and control of distribution networks if the arrangements in the north of Scotland were rolled out into England and Wales.

Items to be considered:

- 1. What arrangements are in place for a DNO to have visibility of NGESO BM instructions.
- 2. What arrangements are in place for a DNO to object / prevent a BM instruction being issued if there are / could be adverse implications for the distribution network.
- 3. What planning and operational arrangements are proposed to ensure that DNO ANM or RDP arrangements work as intended where BM instructions are issued.
- 4. In addition to the operational visibility of the BM instructions, there is a need to consider the planning related issues associated with the associated the (unexpected) changes in power flows. These include the assumptions that the DNO should make when preparing their week 24 submission, whether EREP 130 can still be used to assess the security contribution from embedded BM generation etc. I'm sure there will be others.
- 5. In terms of the primacy work progressing in Open Networks, relating to the interaction between instruction from NGESO and DNOs, how will this be affected by GC0117.
- 6. Understanding further the data flow and go-between issues raised in item c).
- 7. Whether the arrangements in items 1 and 2 would work if scaled as required for an E&W roll out.



**Legal Text**



## **Terms of Reference Review**



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## **Workgroup Report Review**



**Any Other Business**



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