

STCP Modification Proposal Form		
<div><div>PM0135:</div><div>Proposed changes to STCP19-3 to improve the clarity around Compliance responsibilities between the Electricity System Operator and Transmission Owners</div><div><div>Overview:</div><div>The proposal seeks to make changes to STCP (System Operator/Transmission Owner Code Procedure) 19-3. The aim of the proposed changes is to standardise ways of working and improve the clarity around Compliance responsibilities between the ESO and TOs.</div></div></div>		<div>Modification process &amp; timetable</div> <div><div><div>1</div><div>Initial STCP Proposal</div><div>13 June 2023</div></div><div><div>2</div><div>Approved STCP Proposal</div><div>TBC</div></div><div><div>3</div><div>Implementation</div><div>TBC</div></div></div>
<div>Status summary: The Proposer has raised a modification and is seeking a decision from the Panel on the governance route to be taken.</div>		
<div>This modification is expected to have a: Medium impact</div> <div>ESO, Transmission Owners</div>		
<div>Governance route</div>	<div>The Panel will make the decision on whether the modification should be implemented.</div>	
<div>Who can I talk to about the change?</div>	<div>Proposer:</div> <div>David Halford</div> <div><a href="mailto:David.Halford@nationalgrideso.com">David.Halford@nationalgrideso.com</a></div> <div>07812 774065</div>	<div>Code Administrator Contact:</div> <div>Deborah Spencer</div> <div><a href="mailto:Deborah.spencer@nationalgrideso.com">Deborah.spencer@nationalgrideso.com</a></div> <div>07752 466421</div>

Contents

**Contents ..... 2**

**What is the issue? ..... 3**

    Why change? ..... 3

**What is the proposer’s solution? ..... 3**

    Legal text..... 3

**What is the impact of this change? ..... 3**

    Proposer’s assessment against STC Objectives ..... 3

    Proposer’s assessment against the STCP change requirements ..... 4

**When will this change take place? ..... 5**

    Implementation date ..... 5

**Interactions..... 5**

**Panel Determination ..... 5**

**Acronyms, key terms and reference material..... 6**

    Reference material ..... 6

## What is the issue?

STCP19-3 documents the Operational Notification and Compliance Testing processes and responsibilities of both the National Grid Electricity System Operator (NGESO) and the relevant Transmission Owner (TO).

It is the proposers view that after legal separation between the NGET and NGESO, changes should have been made to STCP19-3 in order to standardise ways of working between NGESO and the TOs and remove any potential confusion where NGET is quoted but should reference NGESO (known as 'The Company') in the STC.

The proposed changes also remove the risks of commercially sensitive data being shared and removes potential duplication of tasks between parties.

## Why change?

The modification will ensure that both NGESO and the TOs are clear on their roles and responsibilities in relation to the Operational Notification and Compliance Testing processes which in turn will eliminate potential confusion between parties and provide overall improvements to the process.

## What is the proposer's solution?

Changes will be required to STCP 19-3 to cover the following:

- Amend any references to 'NGET' to "The Company" where appropriate.
- Remove the risk of commercially sensitive data being shared between NGESO and the TOs with the facilitation of a Sharepoint site which will ensure only the relevant data required to validate Compliance is shared between the User and TO.
- Removal of possible duplication of tasks e.g., where the NGESO compliance Team and Project Engineer are chasing the same updates.
- Ensure the role and responsibilities between parties are clearly defined.
- Ensure the compliance process is consistent across all parties.

## Legal text

Attached as Annex A

## What is the impact of this change?

### Proposer's assessment against STC Objectives

Relevant Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	<b>Positive</b> Ensures clarity around the roles and responsibilities in

	relation to the Operational Notification and Compliance Testing process between NGESO and the TOs
(b) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission	<b>Positive</b>  Ensures clarity and efficiency around the roles and responsibilities in relation to the Operational Notification and Compliance Testing process between NGESO and the TOs
(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>  Ensures clarity around the roles and responsibilities in relation to the Operational Notification and Compliance Testing process between NGESO and the TOs and avoids duplication of effort.
(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>Positive</b>  Ensures Users that wish to connect to the National Electricity Transmission System do so with a process which supports an efficient connection.
(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**

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

(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

TBC

#### Implementation approach

N/A

### Interactions

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

N/A

### Panel Determination

Party	Determination
National Grid (ESO)	To be updated following Panel determination
National Grid (TO)	To be updated following Panel determination
Offshore Transmission Owners (OFTOs)	To be updated following Panel determination
Scottish Hydro Electric Transmission plc (SHET)	To be updated following Panel determination

SP Transmission Limited (SPT)	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
SQSS	Security and Quality of Supply Standards
ESO	Electricity System Operator
TO	Transmission Owner
NGESO	National Grid Electricity System Operator

Reference material