

Headline Report

Meeting name	European Code Coordination Application Forum (ECCAF)
Meeting number	2
Date of meeting	30 January 2014
Location	Elxon, 350 Euston Road, London.

Please also refer to the slide pack which has been published¹ with this headline report, as material is not repeated in this headline report.

1. Attendees

ECCAF Members

Barbara Vest	Energy UK	Chair
Paul Wakeley	National Grid	Technical Secretary
Peter Bolitho	Waters Wye	BSC Panel
Garth Graham	SSE	CUSC Modification Panel
Mike Kay	ENWL	Distribution Code Review Panel
Jim Barrett	Centrica	Grid Code Review Panel
Joseph Dunn	SPT	STC Panel
Fiona Navesey	DECC	
Abid Sheikh	Ofgem	
Bec Thornton	National Grid	

Other Attendees

Rob Wilson	National Grid	Presenter
Natasha Smith	Ofgem	Observer
Rupika Madhura	Ofgem	Observer
Sarah Carter	PPA Energy	Consultant for Distribution Code
Steve Wilkin	Elxon	BSC Code Administrator
Verena Leckebusch	Electralink	DCUSA Code Administrator

Apologies

Chris Allanson	Northern Powergrid	DCUSA Panel (See section 3).
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¹ Please refer to: <http://www2.nationalgrid.com/uk/industry-information/electricity-codes/standing-groups/>. The ECCAF webpage is due to go live shortly, in the meantime please refer to the JESG website.

2. Review of Action Log

Please refer to the Action log at the end of this Headline report (Page 7).

3. Membership Update

- **BSC Panel Representative:** Peter Bolitho has joined ECCAF as the representative of the BSC Panel.
- **DCUSA Panel Representative:** Chris Allanson, the DCUSA Panel representative, provided the following update by email:
 - He will remain as the DCUSA representative on ECCAF (although he is no longer a DCUSA panel member); and
 - He will dial in / attend as required, but does not expect to play an active role until the DCUSA is in particular focus.
- **SQSS Panel Representative:** There remains a vacancy for a representative from the SQSS Panel on ECCAF.
- **Consumer Futures:** Cornwall Energy on behalf of Consumer Futures have reported that *“At present we’re keeping Consumer Futures abreast of developments through our Panel engagement (CUSC, UNC and BSC) as well as tracking papers/ material from JSEG [sic] and now EECAF, but if we have any specific issues we’ll certainly be in touch.”* ECCAF noted that there may also be specific issues that they would like to have Consumer Futures involvement with.

4. Option for implementing European Requirements in to GB Code Framework

A number of options were considered for implementing European Network Code requirements in to the GB Codes. The options discussed ranged from an evolutionary approach of using the existing GB Code structures and adding or modifying them to align with the requirements of the European Network Codes, to the more revolutionary approach of starting again from a blank sheet of paper. After extensive discussions two broad approaches were formed around which further discussion was held:

- to broadly stick to existing practices and place European Network Code requirements into existing GB Codes and supporting documents; or
- to adopt a more unified approach requiring a minimum number of new code vehicles.

The following key points formed part of the discussion:

- The current GB codes are a result of the evolutionary process which has occurred over many years, and have previously been significantly amended to capture issues such as NETA, BETTA and Offshore. Each GB Code has a different set of signatories, different focus, different governance arrangements and different Code Administrators. Ofgem has instigated and concluded a review of GB Code governance (in two Phases) and as a result some codes have been modified significantly whilst others have changed very little.
- That some of the GB Codes, notably the Grid Code and D-Code, do not have ‘good governance’ arrangements, and that some ECCAF members would like to see the Grid Code adopt the same governance as, for example, the CUSC. Ofgem noted that the Code Governance Review (Phase 2)² had concluded not to change the governance of the Grid Code or Distribution Code in this manner.
- A one-size-fits-all approach for placing ENC requirements into GB codes may not be appropriate. For example, the Grid Connection Network Codes typically apply to users connecting after a point in time, whereas the Market Network Codes and

² <https://www.ofgem.gov.uk/ofgem-publications/61109/cgr-2-final-proposals.pdf>

System Operation Network Codes apply to all users. ECCAF therefore proceeded to consider the issues of only the Grid Connection Codes at this time, with a view to further discussion on other Codes in the future.

It was noted that the amount of technical work required to either place obligations into existing code, or into new codes is broadly similar; GB specific requirements are likely to need to be drafted from the requirement in the ENCs. In using new codes there is potentially additional complexity to arranging and implementing code administration and governance; however, these are not insurmountable challenges.

It was felt there is merit in a general direction of travel of bringing together GB Codes to make them more consistent and easier to use. However, it was questioned whether, on top of the changes required from Europe, making major structural changes at this point in time was expedient or necessary.

Although the discussion highlighted positives and negative of each approach, it was not clear there was an overwhelming case to moving away from the status quo of using existing GB Code structures.

ECCAF was encouraged by DECC and Ofgem to reach a recommendation to present to each of the GB Code Panels. ECCAF felt that it was able to do so, with a number of caveats:

ECCAF's recommendation is that the existing GB Code structures are appropriate to begin the GB application of the European Connection Codes (Requirements for Generators, Demand Connection and HDVC) which mainly impact the Grid and Distribution Codes.

In this context the work of the joint workgroup established under the GCRP and DCRP to progress GB application of the RfG code should proceed on the basis of using the existing GB Codes.

The approach can be adopted for other European Codes, however, at this stage it does not preclude later revision either for any of the Connection or other European Network Codes as further details become apparent.

It is noted that a number of ECCAF members would like to re-examine the governance process for the Grid Code and D-Code in light of the arrangements used in other GB codes such as the CUSC or BSC.

A particular issue for the RFG is that the requirements in the European law are cumulative. A Type 'D' generator has to meet the requirements for a Type 'A', 'B' and 'C' generators in addition to their own, unless indicated otherwise. There is a desire to see these requirements written in a user friendly way in GB without unnecessary duplication which could lead to divergence over time. It was noted that having multiple GB Codes has always caused issues of divergence, however, even in the European Context these can be managed by the Code Administrators.

This recommendation has been communicated to Code Panels in a separate note after the meeting (see appendices of this meeting note for a copy).

5. Process for ECCAF engagement

This work process for ECCAF is a central part of the group defining its 'delivery strategy', thus discharging the obligations in items 6 and 7 of its Terms of Reference.

Arising from the discussion, the following was proposed. ECCAF has two core roles:

- coordinating the mapping of ENC requirements to the GB Codes, and
- co-ordinating and monitoring the modifications made to the GB Codes, through the normal Code governance processes, to ensure compliance with the requirements of the ENCs being applied through GB Codes.

The anticipated processes for discharging these two roles is outlined in the following tables:

Coordinating the mapping of ENC requirements to the GB Codes	
ECCAF Work process	Stages that ECCAF will consider the ENCs:
<ul style="list-style-type: none"> • A meeting of Code Administrators, open to all stakeholders, will consider the detail of mapping particular ENC requirements to the GB Framework. For many of the ENCs there are documents prepared by NGET and others on initial mappings to GB Codes which can be used as starters. • The group will consider: <ul style="list-style-type: none"> ○ If there is an equivalent requirement in the GB Codes; ○ Does it appear that the existing GB requirement needs to be changed; and ○ where is the most appropriate GB Code location for the ENC requirements • ECCAF will then consider these mappings as a package for consistency and to consider outstanding issues. • The mappings will then be shared with the Code Panels for agreement. The Code Panels are then responsible for making the necessary changes to the GB Codes. • Any exceptions will be flagged to DECC and Ofgem. 	<ul style="list-style-type: none"> • After the ENTSO-E/ACER drafting for an initial view, when there is a 'firm' first draft. • After the Cross-Border committee stage of comitology – at this stage the text is approved but still subject to Council and Parliament approval. The text is not expected to change after this phase. • Upon the development of the methodologies specified in the ENCs after the Codes have entered into force.

Monitoring of GB Code Modifications
<ul style="list-style-type: none"> • ECCAF expects to receive regular updates from Code Panels on the modifications being made, and to address any issues or exceptions. • ECCAF will act as a central hub for coordination between the seven Code Panels.

In fulfilling these roles, ECCAF expects to continue to operate in a transparent and open manner. Information will continue to be shared with Code Panels, JESG, DECC/Ofgem and other forums as appropriate. In addition information will be published on the ECCAF website.

The ECCAF work process as described, is outlined in the following diagram:

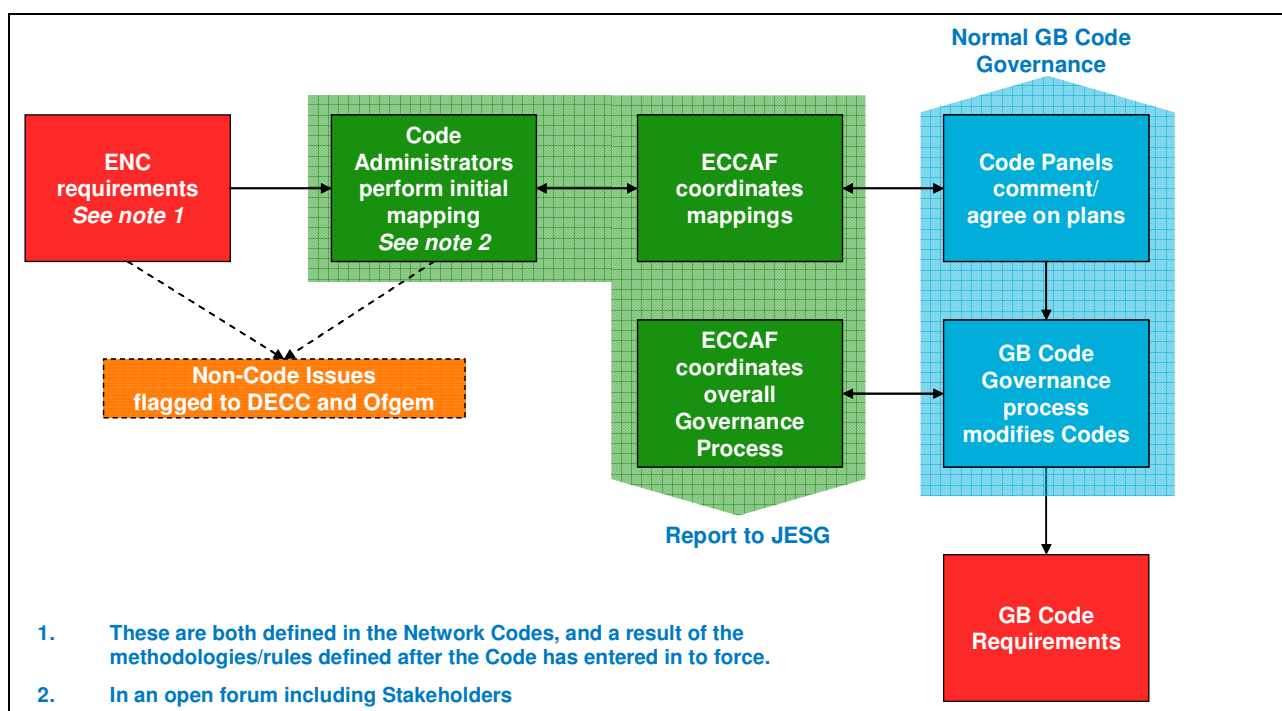


Figure 1: ECCAF work process

6. ECCAF Workplan for 2014/15

The ECCAF workplan is entirely dependent on the timescales associated with the development and agreement of the European Network Codes.

Based on the current expected work plan (published monthly on the JESG website), the Network Codes are expected to reach the two key milestone points for ECCAF's involvement as follows:

ENC	Expected Dates	
	Complete ENTSO-E / ACER drafting	Complete Cross Border Committee
CACM	Already completed	March 2014 – informal text released
RFG	Already completed	April 2014 – informal text released
DCC	Already completed	April 2014, but no informal text has yet been released
OS	Already completed	May 2014
OPS	Already completed	May 2014
LFCR	Already completed	May 2014
FCA	c. March 2014	Q4/2014 - Q1/2015
BAL	End of March 2014	Q4/2014 - Q1/2015
HVDC	End of July 2014	c. Q1/Q2 2015

Based on this data, ECCAF is going to first consider RFG and CACM, and then after that the Operational Codes (OS, OPS, LFCR). DCC will be added when clarity around its timescale arises.

National Grid is to organise the initial Code Administrator Mapping sessions for RFG and CACM before the next ECCAF Meeting.

7. Electricity Balancing Network Code: An initial mapping to the GB Framework

Steve Wilkin (Elexon) provided a personal initial view of how the current draft Electricity Balancing Network Code might map to the existing GB legal framework to facilitate ECCAF discussions.

The broad conclusions from the presentation were:

- the mapping of the Balancing Network Code requirements to GB is much wider than to just the current BSC, or the current GB Codes.
- The implementation of the Balancing Network Code is likely to differ from RFG models (this was considered by ECCAF in developing their recommendation in item 4).

8. Next Meeting

- The next meeting of ECCAF will be held on Thursday 27 March. For the avoidance of doubt the ECCAF meeting on 17 February will not be held.
- Further to Items 5 and 6, a meeting will be arranged between Code Administrators (open to all stakeholders) to discuss the initial mapping of European Network Code requirements to GB Codes starting with the RFG and CACM. Information will be circulated shortly.

9. AOB

There was no further business

ECCAF Action Log

ID	Action	Lead Party	Target Date	Status	Update
New and Existing Actions					
2/1	Do principals in European Network Codes need to be transcribed in to the GB Framework	FN	March 2014	New	
2/2	Arrange session with Code Administrators (and Stakeholder) on initial mapping of RFG and CACM.	PW	March 2014	New	

ID	Action	Lead Party	Target Date	Status	Update
Closed Actions					
1/1	Contact Consumer Futures to ensure we are engaging appropriately especially around obligations on small domestic consumers in RFG / DCC	PW	January 2014	Closed	Reply received from Cornwall Energy, on behalf of Consumer Futures "At present we're keeping Consumer Futures abreast of developments through our Panel engagement (CUSC, UNC and BSC) as well as tracking papers/ material from JSEG and now EECAF, but if we have any specific issues we'll certainly be in touch."
1/2	BSC Panel to consider nominating a new representative to ECCAF, as Barbara Vest as Chair holds that an ECCAF seat automatically, and the Terms of Reference envisage seven Code Panel representatives plus the Chair.	IP/BV	January 2014	Closed	BSC Panel appointed Peter Bolitho as their ECCAF representative at their January 2014 Meeting
1/3	Prepare a set of standard criteria against which to judge different structural methods for making changes to the GB Codes, for discussion at the next ECCAF meeting.	RW/GG	January 2013	Closed	Circulated to ECCAF members. For discussion at February Meeting.
1/4	Prepare calendar of meetings for 2014 for circulation to members, avoiding dates of GB Code Panels and JESG Meetings.	PW	December 2014	Closed	Circulated to ECCAF members.

ECCAF Risks and Issue Log

Issue No	Source	Risk / Issue	Further information
1.	JESG	Implementation: Can areas of the GB Network Code be changed to comply with the ENC's be modified through the normal GB governance arrangements, provided it does not affect compliance with the ENC's?	Governance arrangements of GB Codes are not expected to change by implementing the ENC's. However, GB must demonstrate compliance to the ENC's or risks being found in breach and fined.
2.	JESG	How do the definitions in the Transparency Regulation, expected to become law as an Annex to Regulation 714/2009 prior to any Network Code, interact with those in the Network Codes? Do the definitions in the Transparency Regulations have primacy over those in the Network Codes?	Once published in the OJEU, the definitions became law. The Transparency Regulation have been published are Regulation 543/2009 amending Annex I of Regulation 714/2009. The interaction of future definitions is not yet fully understood.
3.	JESG	How will the changes to the GB Framework be made as a result of the European Network Codes, for example, will existing structures (panels etc.) be used where possible, or will third package powers be used to make changes via the Secretary of State?	It is expected that existing standard Code Governance will be used where possible, however, Ofgem have powers to make changes to the GB Codes to ensure compliance with European legislation.
4.	JESG	Further details of the modification process for GB Codes as a result of the ENC's need to be defined, for example, how will raise modifications, can alternatives be proposed etc.	Noted.
5.	ECCAF	The industry may not have sufficient resource to make the scale of the changes required to the GB Codes.	This is a high impact risk, and all industry parties should consider how application can be done in the most efficient method possible to reduce the burden where possible.

Useful Links

GB Codes: Text and Panel Websites

GB Code	Document	Review/Modification Panel
BSC	http://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/	http://www.elexon.co.uk/group/the-panel/
CUSC	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Connection-and-Use-of-System-Code/	
Grid Code	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Grid-Code/	
D-Code	http://www.dcode.org.uk/the-distribution-code/	http://www.dcode.org.uk/dcode-review-panel/
SQSS	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/System-Security-and-Quality-of-Supply-Standards/	
STC	http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/System-Operator-Transmission-Owner-Code/	
DCUSA	http://www.dcosa.co.uk/Public/DCUSADocuments.aspx?s=c	http://www.dcosa.co.uk/Public/CPs.aspx

NB. The National Grid website has now been updated, and the links above reflect the new website.

Note sent to Code Panels summarising discussion under Item 4.

European Code Coordination Application Forum

Meeting Note to GB Code Panels of discussion on the structural alternatives for GB application of the European network codes - January 30, 2014

At its meeting on 30th January ECCAF considered the structural alternatives for application of the European Network Code requirements to GB Codes. A number of options were considered which included a continuum from the evolutionary approach of using existing industry codes, introducing new groups of GB Codes, or the revolutionary approach of starting from scratch. Following lengthy deliberations two options were considered in more detail:

1. to broadly stick to existing practices and place European Network Code requirements into existing GB Codes and supporting documents; or
2. to adopt a more unified approach requiring a minimum number of new code vehicles.

ECCAF noted that both approaches have merits, and practically, for particular forms of the second approach being considered, they are likely to involve a similar quantity of work for the GB industry.

ECCAF was encouraged by DECC and Ofgem to reach a recommendation to present to each of the GB Code Panels.

ECCAF's recommendation is that the existing GB Code structures are appropriate to begin the GB application of the European Connection Codes (Requirements for Generators, Demand Connection and HDVC) which mainly impact the Grid and Distribution Codes. In this context the work of the joint workgroup established under the GCRP and DCRP to progress GB application of the RfG code should proceed on the basis of using the existing GB Codes.

The approach adopted by ECCAF at this stage does not preclude later revision either for any of the Connection or other European Network Codes as further details become apparent.

It is noted that a number of ECCAF members would like to re-examine the governance process for the Grid Code and D-Code in light of the arrangements used in other GB codes such as the CUSC or BSC.

A further set of meeting notes for ECCAF will be circulated in due course.

If you have any queries, please contact the Technical Secretary, Paul Wakeley, via europeancode.electricity@nationalgrid.com