

Grid Code and STC Interaction Exchange of User Data

Introduction

1. It is proposed to amend the Grid Code such that it is reflective of the System Operator-Transmission Owner Code (STC) provisions for the exchange of User Data. The amendment is required to prevent any inconsistencies and unnecessary confusion regarding the code obligations.
2. Given the potential impact on the relevant parties of any misalignment between the code provisions, an extraordinary meeting of the Grid Code Review Panel (GCRP) has been convened to discuss the proposed Grid Code changes.

Background

3. Schedule 3 (Information and Data Exchange Specification) of the STC specifies the User Data that is permitted to be exchanged from National Grid (as GB System Operator) to Scottish Power Transmission (SPT) and Scottish Hydro Electric Transmission (SHETL) (as the Transmission Owners).
4. The limitations within Schedule 3 were put in place to alleviate concerns regarding the potential of investment planning data prejudicing the facilitation of competition in generation and supply, in the case where the Transmission Licensee has associated generation and supply interests.
5. At time of BETTA Go-Live a specific reference to this version of Schedule 3 of STC was placed in the Grid Code. As such any amendments proposed to Schedule 3 of the STC, with respect to the exchange of User Data, would require a consequential amendment to the Grid Code.

Licence Obligations

6. Since BETTA Go-Live, Schedule 3 of the STC has been amended to enable the Transmission Owners to better facilitate processes which form part of their licence obligations, with respect to:
 - develop and maintain an efficient, co-ordinated and economic system of electricity transmission
 - plan and develop their Transmission System in accordance with the GB SQSS and STC
 - planning the Transmission System such that there will not be any system instability (outside normal system operation)
7. However no changes have been made to the corresponding Grid Code provisions and as such the current version of the Grid Code is inconsistent with the STC.

Proposal

8. It is therefore proposed to amend the Grid Code such that it is continuously reflective of Schedule 3 provisions which will enable the Transmission Owners to better facilitate their licence obligation which respect of designing, planning and maintaining their Transmission System. To do this will require the deletion of the STC reference date.
9. To ensure that Users have every opportunity to comment on proposed changes to the STC, National Grid will notify Grid Code Panel Members and Users of any proposed amendments to STC which, the STC Committee envisages affecting the exchange of User Data. This notification may act as a reminder to Users to review the STC Amendment Proposal and to formally respond to the associated consultation document (if appropriate) specifying any queries/concerns which they may have.

10. National Grid is aware that there is concern amongst Users regarding the maximum permitted consultation period for STC Amendments, which is currently set at ten (10) working days; the STC Committee is currently reviewing this aspect of the STC governance. In cases where the Amendment Proposal affects the exchange of User Data, the STC Committee may view it appropriate to extend the consultation period. National Grid will keep the GCRP informed of progress made by the STC Committee on this issue.
11. The STC governance process provides a mechanism for the industry to raise question/concerns regarding any changes to the STC. In addition any amendments to the STC must be assessed against the applicable objectives, one of which is stated that any amendment must facilitate effective competition in the generation and supply of electricity. As with the Grid Code any amendment to the STC must be approved by the Authority. Finally, as a point of clarity, the Transmission Owners' licences conditions prohibit the exchange of relevant data to their generation and supply interests.

Timescale

12. Given the potential impact on the relevant parties of any misalignment between the code provisions, it is National Grid's recommendation that this proposed Grid Code amendment be progressed as quickly as possible.

Recommendation

13. The GCRP are invited to:
 - a. NOTE the interaction between the STC and Grid Code provisions and that User have the opportunity of responding to any changes affecting the exchange of User Data through the STC governance process.
 - b. AGREE with National Grid recommendation that a consultation paper should be issued for the proposed changes.

Appendix 1: Proposed Legal Text

PLANNING CODE

PC.1 **INTRODUCTION**

PC.1.1 The **Planning Code ("PC")** specifies the technical and design criteria and procedures to be applied by **NGET** in the planning and development of the **GB Transmission System** and to be taken into account by **Users** in the planning and development of their own **Systems**. It details information to be supplied by **Users** to **NGET**, and certain information to be supplied by **NGET** to **Users**. In Scotland, **NGET** has obligations under the **STC** to inform **Relevant Transmission Licensees** of data required for the planning of the **GB Transmission System**. **NGET** may pass on **User** data to a **Relevant Transmission Licensee** where **NGET** is required to do so under a provision of the **STC** ~~current as at 1 April 2005~~. Those categories of **User** information that **NGET** is permitted to disclose to a **Relevant Transmission Licensee**, where required to do so by a provision of the **STC**, are set out in Schedule Three of the **STC** ('Information and data exchange specification').

GENERAL CONDITIONS

GC.12 **CONFIDENTIALITY**

GC.12.1 **Users** should note that although the **Grid Code** contains in certain sections specific provisions which relate to confidentiality, the confidentiality provisions set out in the **CUSC** apply generally to information and other data supplied as a requirement of or otherwise under the **Grid Code**.

GC.12.2 **NGET** has obligations under the **STC** to inform **Relevant Transmission Licensees** of certain data. **NGET** may pass on **User** data to a **Relevant Transmission Licensee** where **NGET** is required to do so under a provision of the **STC** ~~current as at 1 April 2005~~. Those categories of **User** information that **NGET** is permitted to disclose to a **Relevant Transmission Licensee**, where required to do so by a provision of the **STC**, are set out in Schedule Three of the **STC** ('Information and data exchange specification').