

## Headline Report

<b>Meeting name</b>	Joint European Standing Group (JESG)
<b>Meeting number</b>	7
<b>Date of meeting</b>	01 May 2012
<b>Location</b>	Elexon, London

This note sets out the headlines of the most recent meeting of the Joint European Standing Group (JESG).

1. **Issues Log Review.** The issues log was reviewed as each code was presented.

2. **Grid Connection Framework Guideline. Requirements for Generators (RfG)**

- ENTSO-E launched the public consultation<sup>1</sup> on the draft RfG Network Code on 24 January 2012 for a period of 8 weeks until 20 March 2012
- 6052 comments were received to the consultation which ENTSO-E has welcomed and is working through
- These comments have been collated into 800 topics
- ENTSO-E will be considering making several hundred changes to the drafting to satisfy the majority of the comments received
- The final proposals will be sent to ACER by the end of June with comitology due to start in October 2012
- JESG recommend creating an extra workshop in June or July to discuss the revised draft
- Feedback from the RfG user group meeting on 03 May will be reported back to the JESG

### ***Demand Connection Code (DCC)***

- The DCC is closely linked to the RfG Network Code and will follow similar principles for existing users notifications and derogations
- It will cover 'significant' demand customers that are connected to Transmission and Distribution networks, from the perspective of cross border impact and market integration
- The DSO Expert group has held 7 meetings since July 2011
- A stakeholder document was published on 05 April 2012 ("Call for Evidence") which identifies a number of potential new areas which the DCC may cover. The degree of applicability of these (requirement as well as mandatory or voluntary nature) will be determined as a result of this stakeholder engagement
- Feedback is requested to be provided by 09 May 2012
- National Grid held a JESG DCC workshop on 26 April 2012
- Stage 2 consultation (formally consulting on the draft Network Code) will be out for 8 weeks (July / August)
- When the draft Network Code is at a suitable stage of development, National Grid will create a comparison document between the DCC and Grid Code in a similar format to the RfG comparison
- There is the potential for the DCC provisions to impact on consumers in relation to appliances with passive/active frequency response capability. For example there may be options on washing machines to use a cheaper tariff depending on the time it is switched on. However, it was recognised that this has a cross over with smart grids
- The initial Cost Benefit Analysis (CBA) does not mention the value to the consumer but has the cost of installing the equipment
- ENTSO-E seeks additional information for the CBA from stakeholders to allow reflection of differing views

<sup>1</sup> <https://www.entsoe.eu/index.php?id=612>

### 3. **Capacity Allocation and Congestion Management (CACM) Framework Guideline.**

- Will create a pan European electricity market by removing barriers for cross border trading subject to network constraints
- Seeking minimal disturbance to market rules
- Day ahead market – transfers between markets sold via implicit auctions
- Intraday market – (continuous market) allows parties to optimise position as close to real time as possible
- The Network Code will undergo industry consultation in Spring 2012
- JESG held a workshop on 15 March 2012 to discuss the CACM Code based on the latest draft of the Network Code
- The public consultation on the draft CACM Network Code was published on 23 March 2012 with a closing day for comments on 23 May 2012
- National Grid has created an initial spreadsheet to explain the Network Code
- This will be circulated to the JESG members for information and comments are welcome
- An ENTSO-E representative; Mark Copley, will be presenting at the JESG CACM workshop 14/15 May and views are welcome on topics to be presented
- The ENTSO-E consultation response tool will also be presented at the workshop
- A page turn of the draft will be undertaken as it will be the only time to discuss it in detail
- There will also be discussions on the interaction with other codes e.g. balancing and forwards code

### 4. **System Operation Framework Guidelines.**

#### ***Operational Security (OS) Network Code***

- Aims to set out the minimum requirements for the real time operational security
- Achieve common principles across all TSOs and enable cooperation
- Network Codes on Emergency & Restoration and New Applications have not started yet
- Contingency analysis - N-1 – refers to a single contingency which can be a double circuit fault. This differs from the common GB use of terminology of N-1 and N-2
- DSO role – intention for it to be more active rather than passive. Should be calling them DSOs rather than DNOs
- ACER wants detail in document about what a “significant user” should be
- The definitions of reserve products are different to the current Grid Code definitions
- As currently drafted, most of the activities within the OS Network Code are already covered in the Grid Code

### 5. **Electricity Balancing Framework Guidelines.**

- ACER published a consultation on the Balancing Framework Guidelines on 25 April 2012 which closes on 25 June 2012. This is looking at the following
  - Cross Border exchanges of balancing services – including the potential pooling of TSO to TSO balancing resources into a common merit order
  - Procurement of balancing reserves
  - Cross border capacities
  - Imbalance settlement – harmonisation of principles only
- The Framework Guideline proposes several options for market integration:
  - ENTSO-E model enables a balancing service provider to provide balancing services to a TSO in a different area
  - In-between model – TSOs share the available balancing service providers in a common pool which are despatched according to the price order of the bids and offers. Some margin will be maintained by individual TSOs
  - Fully integrated – as with the in-between model, but all energy will be in common pool
- No differential treatment for renewables in FGs
- The FGs will be prescriptive in defining the merit order list for balancing energy – the consultation asks whether parties are supportive of “pay as cleared” principle as opposed to “pay as bid”

- **Useful Links**

How a mid-term target model for balancing energy can deliver efficiency benefits and stimulate future integration

[https://www.entsoe.eu/fileadmin/user\\_upload/library/position\\_papers/120228\\_Mid\\_Term\\_Model\\_Balancing\\_final.pdf](https://www.entsoe.eu/fileadmin/user_upload/library/position_papers/120228_Mid_Term_Model_Balancing_final.pdf)

Cross border capacity allocation for the exchange of ancillary services

[https://www.entsoe.eu/fileadmin/user\\_upload/library/position\\_papers/120228\\_Mid\\_Term\\_Model\\_Balancing\\_final.pdf](https://www.entsoe.eu/fileadmin/user_upload/library/position_papers/120228_Mid_Term_Model_Balancing_final.pdf)

Key messages on cross border balancing

[https://www.entsoe.eu/fileadmin/user\\_upload/library/position\\_papers/120301\\_Optimizing\\_the\\_use\\_of\\_balancing\\_resources\\_in\\_Europe.pdf](https://www.entsoe.eu/fileadmin/user_upload/library/position_papers/120301_Optimizing_the_use_of_balancing_resources_in_Europe.pdf)

Position paper on cross-border balancing

[https://www.entsoe.eu/fileadmin/user\\_upload/library/position\\_papers/120228\\_Mid\\_Term\\_Model\\_Balancing\\_final.pdf](https://www.entsoe.eu/fileadmin/user_upload/library/position_papers/120228_Mid_Term_Model_Balancing_final.pdf)

Cross-border balancing maps

[https://www.entsoe.eu/fileadmin/user\\_upload/library/position\\_papers/120228\\_Mid\\_Term\\_Model\\_Balancing\\_final.pdf](https://www.entsoe.eu/fileadmin/user_upload/library/position_papers/120228_Mid_Term_Model_Balancing_final.pdf)

**6. Forthcoming events/workshops**

- There may be an ENTSO-E operational planning and scheduling workshop on 23 May which clashes with the JESG – JESG to be cancelled
- There may be an opportunity to either await the next JESG meeting on 13 June or reschedule to an earlier date. This is to be kept under review
- There will be an ACER workshop in Ljubljana on Electricity Balancing to present the Framework Guidelines on 29 May 2012

**7. Next meeting.**

- The next scheduled meeting will be held on 13 June 2012, subject to review, at Elexon's offices in London

The issues logs can be found on the next page

## Actions Log

Action No	Action	Lead Party	Status
5	Determine the priority issues within the issues log	Barbara Vest & All	Ongoing
9	JESG to agree list of top 10 issues for the RfG	All	Ongoing
10	Consider whether a group response to the RfG consultation should be sent to ENTSO-E	All	Complete
11	Members to look at Transparency Guidelines in detail and provide feedback by 03 February 2012	All	Complete
12	Investigate whether the July and August JESG meetings can be moved to an alternative venue due to the Olympics	Steve Lam	Complete
13	Ofgem to facilitate the advertisement of JESG to target micro generation	Olaf	Ongoing
14	Ofgem to highlight issue to ENTSO-E of the 'significant' classification in relation to CACM	Olaf	Ongoing
15	Add standing agenda item to review whether the relevant stakeholders are present for the Network Code under discussion	Steve Lam	Complete
16	Barbara to provide contact details for HHIC and Micropower council in order for National Grid to facilitate an information sharing session on RfG	Barbara Vest	Complete
17	Circulate name of DCC User Group contacts to the JESG	Dwayne Shann	Complete
18	Create a detailed DCC subgroup once the consultation has been published	NGET	Complete
19	Barbara to provide contact details for EIUG, MEUC and BEAMA to publicise any future DCC subgroups and current work	Barbara Vest	Complete
20	Chair of JESG to write to ENTSO-E to request that not all meetings are held on Mondays and Fridays as it will discourage attendance	Barbara Vest	New
21	Invite consumer focus to the JESG	Steve Lam	New
22	Invite a Smart Grid Forum representative to the JESG to take into account work on smart grids (Tom Luff, Gareth Evans)	NGET	New
23	Consider extending the DCC workshop in July	NGET	New
24	Ofgem to circulate link to the maps for the Balancing Framework Guidelines	Olaf Islei	Complete
25	Cancel the 23 May meeting and review the 13 June JESG meeting	NGET	New
26	Circulate the CACM spreadsheet	Will Kirk Wilson	New

27	Organise an extra RfG workshop in July to take into account the new drafting of the Network Code (seek attendance of GB user group representatives)	NGET	New
28	Feedback to be provided at next JESG on the newly formed consistency group in ENTSO-E	NGET	New
29	JESG members to provide comments to CACM spreadsheet	All	New
30	Olaf to check if Ofgem would like to meet with the JESG to discuss the RfG during the ACER review	Olaf Islei	New
31	Update group if ENTSO-E publish a revised draft of the RfG Network Code	NGET	New

The generic issues log can be found on the next page

## Generic Issues Log

Issue No	Issue
1.	How do the Network Codes align with the individual framework Guidelines?
2.	Concerns over the mechanism for the publication of data under REMIT
3.	The potential for different definitions of significant across Network Codes
4.	The implementation of the RfG could conflict with CACM as they are at different stages in the Network Codes process
5.	What is contribution of each code to resolve issues? Need a strategic view of the codes but not sure which is the best place to do this.

## CACM Issues Log

Issue No	Issue	NGET View
1.	CACM – different interpretation of significant may lead to different treatment of generators in GB	There is coherence between the Grid Code obligations placed on Generators to provide data according to their significance (to the planning and operation of the transmission system) and those in the RfG Network Code. However in order to model the GB system in the Capacity Calculation it may not be necessary for all Generators of a particular Type (as defined in the RfG Network Code) to provide data.
2.	CACM- potential risk of generators switching in and out of 'significance' depending on the SO view during different system conditions	It will be unlikely that a generator will switch in and out of significance but in any case, the change process would be set out through standard industry governance
3.	Bidding zones decided by NRAs and TSOs and potentially can cross member state boundaries. How will this process work?	The regional process is set out in the draft code. However the text is at a high level and the details are left as a local decision.
4.	What is the Regional process for changing bidding zones	The regional process is set out in the code.

## DCC Issues Log

Issue No	Issue	NGET View
1.	What will be the contractual relationships between domestic User and DSO? There may be no direct monetary benefit for the consumer from providing demand side response – it's an overall societal benefit. Will there be an aggregator on behalf of the consumers to link with suppliers?	
2.	Will the smaller scale Frequency Response be mandated e.g. for appliances? One of the options in the call for evidence document does include an option for mandatory services (within CBA Appendix 2)	
3.	There is a concern that very complicated and interdependent solutions are being rushed through. For example it has taken GB 2 or 3 years to conclude that synthetic inertia is not potentially the best solution.	
4.	Demand Side Response is complex and some members have concerns that it is being rushed through without considering other potential options e.g. synchronous compensators have not been mentioned as an alternative in the consultation. Currently NG contracts for STOR with demand but this has not been mentioned in the DCC initial proposals.	
5.	The DCC has the potential to introduce many changes which aren't being developed gradually. The problems should be defined precisely first before changes are proposed/ finalised	
6.	What are the cash flows in the process of DSR?	
7.	DCC is about TSOs accessing DSR rather than DNOs – is this the correct way forward?	
8.	A Large number of small generators will be captured within the RfG (down to 400W) therefore; will this be the same for the DCC?	



## Operational Security Issues Log

Issue No	Issue	NGET View
1.	Draft 1 of the Op Security NC suggests that embedded generators >1MW need permission of TSO before can reconnect after a trip, and Demand sites need to inform TSO of any changes to their facilities – this is not realistic	The draft is an early version, this cross references to Gen types from RfG NC were a late edit into the draft NC so have not been fully discussed in the drafting team. We would anticipate several areas of the draft NC including these ones will
2.	What is the changes for GB, what is the cost benefits	When the Code is further developed we will also have a position paper which should provide justification / cost benefit for new obligations in the OS NC. NatGrid will produce a summary of existing Grid Code obligations compared to new obligations under this NC.
3.	What is the linkage between this Op Security NC and the other Operational NC	ACER have suggested that the other NCs being drafted under the FWGL for System Operation (Op Planning and Freq Control) should be developed and consulted upon all at the same time.

## RfG Issues Log – 01 March 2012

Banding/parameter selection		
1	How and why were the boundaries for types A, B, C and D selected? They look more onerous than other EU zones. How and why were the GB zone specific parameters selected in the RfG?	Sizing was selected based on the size of synchronous area by the Drafting Team in order to produce proportional and fair obligations. GB corresponds broadly to similar sized areas. <b>Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain</b>
2	Has “significant” been interpreted correctly?	NGET and ENTSOE believe it has, ACER has indicated no concerns with this, to date. <b>Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain</b>
3	Band boundaries can be lowered on a national basis so why weren't the GB bands set at current levels so they can be reviewed and lowered as appropriate to the proposed levels?	The distinction between “power generation facility” (GB power station equivalent) and “generating unit” (GB BMU equivalent) is important in that it means direct comparison between existing and future potential obligations are not relevant. The Drafting Team has proposed that band boundaries can be applied to smaller generators than a defined maximum but it was felt that these maximums were required to ensure a fair and effective assignment of minimal network support from all generators. <b>Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remains</b>
4	Type A/B boundaries require for there to be an appropriate regime in place to certify mass market products but this is currently not the case.	NGET agrees with statement. Ideas are invited to encourage such a regime to be developed. This is currently under review in ENTSOE and therefore stakeholder feedback on this would be beneficial. <b>Item closed – GB stakeholders invited to respond to ENTSOE</b>
5	Definitions for Generating Unit is ambiguous	Feedback was taken on board prior to the 24 <sup>th</sup> January consultation being published – and definition amended, in line with previous comments. Some parties still felt that ambiguity remains. <b>Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remains</b>
6	Band C and D boundaries move the current LEEMPS obligations down to 10MW	See item 3. In addition, National Grid confirmed that the proposals could result in result in certain new 10MW BMUs from being subject to obligations similar to current LEEMPS generators but it should also be noted that other sized new generators would be subject to less onerous obligations. <b>Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remains</b>
7	The application of additional reactive and stability obligations on >10MW generates (i.e. non-synchronous) will add cost to generators and DNOs	See item 3. The requirement for this is based on facilitating ongoing security of supply faced with a growing amount of embedded generation. Additional information is provided in M&A 2.4 and FAQs 7 and 22. <b>Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remain</b>
8	Which parameters/obligations change/will not	See item 11.

	change/may change?	<b>Item Open</b>
9	What is the formal governance process for the setting of TSO parameters within RfG ranges?	NGET is committed to normal GB governance to implement any resulting changes within GB codes. Whilst it is assumed that the GCRP will be the main Panel involved it was also recognised that other Panels such as the DCRP or STC Committee may also be involved. <b>Item closed</b>
10	Criteria for selection of type of boundary to be in RfG?	EU law states what and not why, the rationale (and criteria) is included within the FAQ and M&A document. <b>Item closed – GB stakeholder invited to respond to ENTSOE if further concerns remains</b>
<b>RfG Implementation</b>		
11	What will the impact be of RfG on the Grid Code (GC) and other GB Codes?	NG has prepared a comparison with the GC obligations, and the DNO community via Mike Kay has prepared a similar version against D Code. The group acknowledged this material was useful, however further work is required to highlight where changes will be required (a traffic light system) <b>Item open</b>  <b>Action</b> – sub group to be established to traffic light the change requirements (indicating where obligations would change as a result of the Network Code). This should consist of NGET and members of the JESG, type A & B generator representation also to be invited (HHIC and Micropower Council identified as possible contacts). Action to be undertaken following completion of the RfG consultation period.  <b>Action</b> – a word version of the current comparison document to be circulated (this will first be extended to ensure all “new” requirements are also captured).
13	How will GC compliance be demonstrated?	Compliance arrangements within the RfG are based on GB arrangements for large units (A10 currently with Ofgem for approval). The meeting agreed that the arrangements for types C, B and A feel unnecessarily bureaucratic, which stakeholders were invited to feedback in their consultation responses. <b>Item closed – GB stakeholders invited to respond to ENTSOE</b>
14	When will RfG obligation apply to new generators?	RfG will apply 3 years after comitology completes. All generators with binding contracts before this time will not be classified as new. Further information can be found in M&A section 3. The meeting requested a timeline setting out the process on when requirements would apply to new generators  <b>Issue Open - Action</b> – NGET to prepare and circulate timeline clarification
<b>Justification</b>		

15	Is NGET going to produce a GB specific justification document?	No. ENTSOE considers the FAQ and M&A document as laying out the justification  <b>Issue Open - Action</b> – NGET to feedback to ENTSOE that it would be useful to allow stakeholders to comment on the FAQ and M&A.
16	Where is the CBA for FRT for Type B/C generators?	There is not one. Section 3.2 of M&A details ENTSOE view and explanation that a qualitative approach has been adopted. <b>Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain</b>
<b>Retrospectivity</b>		
17	What is the precise methodology for assessing whether retrospectivity is applied?	Decision by NRA on basis of TSO proposal, after public consultation (based on CBA). Detail provided in FAQ 11 <b>Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain</b>
18	Can the authority unilaterally apply obligations retrospectively?	No <b>Item closed</b>
<b>Style Drafting approach</b>		
19	RfG drafting is not always clear	Any comments on drafting clarity are very much welcome as part of the Consultation <b>Item closed - GB stakeholders invited to respond to ENTSOE</b>
20	Recitals may require updating	This is one of the items that the ENTSO E legal resource group is in the process of considering <b>Item closed</b>
21	Methodology/ criteria for selection of Type boundaries should be included in RfG	It was agreed that it is not common practice to include the “whys” in European legislation (or GB Codes) but only the “whats” (as per item 10). <b>Issue closed</b>
<b>Specific Technical Elements</b>		
22	The parameters for the reactive power range may be too inflexible and should therefore be future proofed	Issue not discussed at Tech JESG but Slides describing NGET’s response have been posted on the JESG webpage: NGET does not fully understand concerns as it is believed that the proposed obligations provide greater flexibility than existing GB Codes. The NC code provides a permitted range which can be narrowed down by the GB Panels. <b>Issue Open</b>
23	Does the proposed drafting for Article 9 Paragraph 2(a)(1) of the RfG NC comply with the current GB obligations around Electronic Despatch Logging (EDL) in the Grid Code?	Issue not discussed at Tech JESG but Slides describing NGET’s response have been posted on the JESG webpage. <b>Issue Open</b>
24	Article 9 paragraph (b) concerns the provision of inertia and contains the wording “may be required” which is very open. However the decision whether Synthetic Inertia is required will be delegated to the	Issue not discussed at Tech JESG but Slides describing NGET’s response have been posted on the JESG webpage. Synthetic inertia is already being considered in GB and would be applied only on through a GB Panel decision this is unlikely to affect this process and the final decision. <b>Issue Open</b>

	national level.	
25	The upper voltage operating limit is currently 15 minutes in Grid Code but in the RfG it has been increased to 20 min	Following previous meeting, this issue was taken back to Drafting Team and the 15min limit has been accepted and included into the Network Code. <b>Issue Closed</b>
26	What were the assumptions behind the minimum Fault Ride Through (FRT) obligations for sub 132kV network?	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. There is no intent for any substantial changes, only to implement existing GB obligations in a more harmonised manner. <b>Issue Open</b>
27	What happens when there is a common/ shared Point of Connection e.g. Cruachan and Ffestiniog?	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. Issue has been taken back to DT and drafting has been amended so that in GB two such units can be treated as separate units. <b>Issue Closed</b>
28	The proposed rate of change of frequency withstand is 2 Hz/sec for 1.25s	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. Taken back to DT and drafting now reflects current GB practice. Time aspect removed. <b>Issue Closed</b>
29	Who will own the Dynamic System Monitoring (DSM) equipment? (Fault recorders)	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. No change envisaged for GB. <b>Issue Closed</b>
30	Auto-reclosure obligations have changed (8-2(a))	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. National Grid believes the latest consulted version may have resolved this issue? These specific obligations are subject to national choice. <b>Issue Open</b>
31	Fault Ride Through is now applied at the generator connexion point. In the current GB code it is defined at the interface between transmission and distribution. So this represents quite a change. Whilst this is a surprise, it might not be a bad thing in that it at least makes the requirements consistent for every DG connexion point. Some of it does look over specified – in effect the RfG is specifying the FRT for 11kV faults as well as supergrid faults.	Issue not discussed at Tech JESG but slides describing NGET's response have been posted on the JESG webpage. It is not intended to make generators (including those embedded) responsible for transmission circuit faults. <b>Issue Open</b>
32	The code forces a formal EON; ION; FON process on us for all generation – ie energization notice, initial operation notice, final operation notice. This is	Issue not discussed at Tech JESG but Slides describing NGET's response have been posted on the JESG webpage. <b>Issue Open</b>

	the process NGET use for all transmission connected generators. It seems it needs to be applied right down to 400W inverters now. I'm sure we can tame the bureaucracy below 10MW, but we'll probably be stuck with some new process and admin to some degree.	
<b>New Issues/ Questions</b>		
33	Retrospective application – the 3 year review period for reconsidering retrospective application is a risk to ongoing project security	The FWGL directs this requirement. The meeting agreed that this continued to represent a risk. <b>Item closed</b> – GB stakeholders continue to consider this a risk, but within Network Code process this cannot be addressed
34	Retrospectivity and application to GB framework (a) definitions (with complications when compared with existing GB definitions) (b) general application of European Network Codes to GB framework	The meeting agreed that the implementation of new definitions could cause significant complications for implementation, including ensuring consistency across all European Network Codes. With regards to implementation of European Network Codes, the view from ENTSOE legal team is that European legislation cannot be directly replicated elsewhere (i.e. within GB codes). NGET lawyers are reviewing how European Network Codes might be implemented and will report back to the JESG. <b>Action</b> – NGET to report back view on implementation arrangements.
35	Is there sufficient justification of applying European Codes to GB Codes?	Justification of the RfG Network Code from ENTSOE was presented at the meeting. The meeting agreed that views were likely to differ on this statement and stakeholders should consider responding as they see fit. <b>Item closed</b> – GB stakeholders invited to respond to ENTSOE with any further comments
36	Are GB stakeholders consistent over the position with regards to Ireland? (Given that UK Government will be acting for Northern Ireland, and Ofgem representing the NI regulator)	The meeting noted that this was not within the vryies of the group, and should be logged for note only. <b>Item closed</b>
37	Who will provide notification to generators of what type they are? (A, B, C D)	The meeting noted that the onus on complying with legislation rests with the party on which the obligation is placed, and therefore it is not the responsibility of any other party to inform them. <b>Item closed</b>
38	The lack of type A and type B representation at the JESG meetings was questioned?	National Grid confirmed that attendance to these meetings is open to all and that invitation had been sent out to the usual broad distribution lists. It was felt that National Grid should have contacted extraordinary parties. <b>Action</b> – NGET to include review of stakeholder membership as a standing item on future JESG meetings. Contacts from HHIC and Micropower Council to be contacted by NGET for briefing on RfG in advance of the consultation period closing.
39	What is the proposed future mechanism for	It was confirmed that there is an ongoing initiative to develop a National registration mechanism

	Manufacturer/ Performance Data registration with TSOs?	for GB, perhaps on an accredited third party basis? This is also being considered by other Member States. <b>Issue closed</b>
40	"new requirements not in existing code e.g 92.91 - available power from PPMs"	Issue raised but not discussed <b>Issue Open</b>
41	Which takes priority over the Network Code, M&A and FAQ (for definitions)	A potential issue was raised that there were conflicting statements between the three documents. It was confirmed that only the Network Code had any legal force and ENTSOE are in the process of reviewing consistency. <b>Issue Closed</b>
42	Can we comment on FaQ and M&A documents during consultation?	<b>Item open</b>  <b>Action</b> - As per item 15 NGET to feedback to ENTSOE that it would be useful to allow stakeholders to comment on the FAQ and M&A.
43	Where is the CBA for changes e.g. 16.3.C1 - Changed during drafting to introduce new requirements	Issue raised but not discussed <b>Issue Open</b>
44	Retrospective applications can be reassessed every three years - this poses a significant risk to new generation investments. Also will new derogations then only be granted on a three yearly basis?	Agreed as an issue - but process for retrospectivity is set out in Framework Guidelines. <b>Issue closed</b>
45	Fundamentally, where was it justified that generators connected to GB network, which is not synchronous with the continent's network, should have the vast majority of RfG obligations applied to them?	A proportion of members could not see how GB generators, especially smaller ones, can be of cross border significant to the continental network. Others felt that with increasing DC interconnection and with common mode failure mechanisms that this is not the case. <b>Issue Closed - GB stakeholders invited to respond to ENTSOE</b>
46	Definition for "Generating Unit" is similar to BMU rather than power station. This has been poorly understood and has a big impact.	The distinction between "power generation facility" (GB power station equivalent) and "generating unit" (GB BMU equivalent) is important in that it means direct comparison between existing and future potential obligations are not relevant. It was thought that there may be a risk of creating a back door implementation route for existing plant <b>Issue Closed - GB stakeholders invited to respond to ENTSOE</b>
47	Impact assessment - any IA measured against the cost of a "total Europe black out" is going to result in a positive outcome as the societal cost of a wide, total outcome is so massive	Agreed that this is one sided but also agreed that such a blackout is plausible and would be economically devastating <b>Issue Open</b>
48	Article 2 definitions e.g. control area derogations do	Issue raised but not discussed

	they work across other codes?	<b>Issue Open</b>
49	Commentary on justification FG 2.1. Final paragraph	<b>Issue Open</b>
50	Is it worth undertaking a GB Cost Collection/collation activity now? To aid any future CBA	No decision made at this time <b>Issue Open</b>
51	The DT claims that a data request for potential cost impact was ignored by generators but no generators present were aware of such a request	It was suggested that if ENTSOE showed Ofgem the data request made during the pilot stage of RfG drafting, this would allow greater confidence that a true quantitative Impact Assessment was indeed attempted by the DT. <b>Issue Open</b> <b>Action – NGET to feed back to ENTSOE</b>
52	OFGEM and DECC are representing GB and N. Ireland	Point noted <b>Issue Closed</b>