

Headline Report

Meeting name	Joint European Standing Group (JESG)
Meeting number	8
Date of meeting	13 June 2012
Location	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 logs were reviewed, as required, as each Network Code was presented.

2. **Grid Connection Framework Guideline.**

Requirements for Generators (RfG)

- The ENTSO-E public consultation on the draft RfG Network Code ran from 24 January 2012 until 20 March 2012.
- 6052 comments were received to the consultation. These comments have been consolidated in to around 1000 topics and have resulted in around 300 changes to the Network Code.
- The final Network Code will be submitted to ACER by the end of June.
- Elements of the Network Code will allow for member state choice as different requirements of the Network Code will be either:
 - Compulsory Europe-wide;
 - A principle or range in which member states can choose;
 - Mandatory or non-mandatory.
- JESG will hold a workshop during July to discuss the version of the Network Code submitted to ACER. NGET is in the process of updating the comparison document for the Network Code. The meeting will focus on members' key issues.

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 stage 1 consultation – Call for Evidence – closed on 9 May 2012:
 - A total of 21 organisations responded, including 3 late responses and 7 from UK;
 - A variety of responses were received ranging from full support to out-right rejection;
 - No alternative CBAs were provided or significant alternative data.
- The Network Code is now being prepared by ENTSO-E for formal consultation.
- The formal consultation will run from 30 June until 3 September. Paper can be downloaded and consultation responses made, via the ENTSO-E website¹.
- The consultation pack will include:
 - Draft Demand Connection Network Code;
 - Explanatory note, covering: Evaluation of feedback on stage 1; Spreadsheet – full raw feedback; and Further Cost Benefit Analyses;
 - Frequently Asked Questions.
- Stakeholder Engagement during the formal consultation is planned as follows:
 - ENTSO-E workshop, 8 August, Brussels;
 - The JESG DCC workshop was scheduled to take place on 16/17 July. However, this has now been rearranged to August (TBC) to allow the industry sufficient time to read the draft Network Code.

¹ <https://www.entsoe.eu/resources/consultations/>

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 formal consultation closed on 23 May 2012. Over 2000 comments were received from 30 respondents from across Europe. Stakeholder engagement was held as follows:
 - ENTSO-E workshop, 7 May 2012;
 - JESG DCC Workshops 14 and 15 May 2012.
- Over 50% of the comments related to Capacity Calculations and Bidding Zones. 25% related to Intraday Markets and Day-ahead markets, with the remaining comments covering the other sections of the draft Network Code.
- ENTSO-E is now reviewing the comments received. Comments will either result in a modification to the Network Code or will be rejected. In either case, ENTSO-E's position on the comment will be published.
- Further stakeholder engagement to discuss the proposed changes to the Network Code is planned for:
 - ENTSO-E workshop, 3 July 2012, Brussels;
 - Update at JESG Meeting, 17 July 2012, Warwick;
 - JESG Workshop, Mid October.

4. System Operation Framework Guidelines.

Three Network Codes are currently being prepared under the System Operation Framework Guidelines. An update of the timings for each Network Code is as follows:

Operational Security (OS) Network Code

- Network Code to establish common security principles for system operation:
 - 1st draft Network Code published by ENTSO-E: 12 April
 - ENTSO-E public workshop: 20 April
 - 1st presentation at JESG: 1 May
 - Further ENTSO-E public workshop: 2 July
 - Planned update to JESG: August
 - ENTSO-E consultation: Sep/Oct 2012

Operational Planning and Scheduling (OP&S) Network Code

- Network Code to establish activities and tasks conducted prior to real-time:
 - 1st draft Network Code published by ENTSO-E: 15 May
 - ENTSO-E public workshop: 23 May
 - Further ENTSO-E public workshop: Late July
 - Planned update to JESG: August
 - ENTSO-E consultation: Nov/Dec 2012

Load-Frequency Control and Reserves (LFR) Network Code

- Network Code to cover the real-time balancing of generation and demand to control system frequency:
 - Drafting officially commences: 1 July
 - ENTSO-E public workshops: 12 July, 25 Sep
 - Planned update to JESG: Sep
 - ENTSO-E consultation: Feb/Mar 2013

5. Electricity Balancing Framework Guidelines.

- ACER published a consultation² 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;
 - Treatment of cross border capacity;
 - Imbalance settlement – harmonisation of principles only.
- The Framework Guideline proposes a model for market integration:
 - TSO to TSO model with common merit order for exchange of balancing energy – TSOs share the available balancing service providers in a common pool which are despatched according to the price order of the bids and offers. The model allows some possibility for TSOs to reserve margins and maintain product differentiation;
- Framework Guidelines requires no differential treatment for renewables.
- The Framework Guidelines currently prescribes a pricing principle to establish the common merit order – the Framework Guideline requires balancing energy to be priced “pay as cleared” principle as opposed to “pay as bid”.
- A workshop was held in May by ACER to discuss the Framework Guidelines. The majority of comments were from ENTSO-E. Feedback from the workshop included:
 - A 5-7 year implementation period was seen as necessary due to the complexity associated with integrated balancing markets/mechanisms;
 - There is a reluctance to use a common merit order for Frequency Response;
 - There is a reluctance for complete harmonisation of balancing products;
 - There is no clear feedback on whether “pay as cleared” or “pay as bid” is preferred;
 - There is a lack of experience in integrating balancing systems, therefore the network code may be less prescriptive than CACM;
 - One remaining issue is the clarity of the scope of the Framework Guidelines. For example, it seems that it does not cover constraint management actions, but this is not clear in the text.
- ACER welcomes responses to the consultation from all market participants and GB stakeholders are encouraged to respond.
 - Market participants may have different priorities in market integration from TSOs. Therefore, to be able to capture their views, market participants are encouraged to respond to the consultation.
 - The consultation closes at 25 June 2012, 12:00 noon, Central European Time.

• 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

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

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

Position paper on cross-border balancing

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

² http://www.acer.europa.eu/Official_documents/Public_consultations/DFGEB-2012-E-004_FG_on_Electricity_Balancing/default.aspx

6. Forthcoming events/workshops

Details of forthcoming JESG events and workshops will be maintained on the website:
<http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/workingstandinggroups/JointEuroSG/>

Details of forthcoming ENTSO-E events are published on the ENTSO-E website:
<https://www.entsoe.eu/resources/network-codes/>

A workshop on European Network Codes will be hosted by RenewableUK on 26 June 2012.

7. Next meeting.

- The next scheduled meeting for the JESG is 17 July 2012 at The Saxon Mill, Warwick.

The actions log can be found on the following 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
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	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. Peter Bolitho to provide BV with some words on the ENTSO-G process	Barbara Vest Peter Bolitho	Open
21	Invite consumer focus to the JESG	Steve Lam	Complete
22	Invite a Smart Grid Forum representative to the JESG to take into account work on smart grids (Tom Luff, Gareth Evans)	NGET	Complete
23	Consider extending the DCC workshop in July	NGET	Complete
25	Cancel the 23 May meeting and review the 13 June JESG meeting	NGET	Complete
26	Circulate the CACM spreadsheet	Will Kirk Wilson	Complete
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	Complete
28	Feedback to be provided at next JESG on the newly formed consistency group in ENTSO-E	NGET	Complete
29	JESG members to provide comments to CACM spreadsheet	All	Complete
30	Olaf to check if Ofgem would like to meet with the JESG to discuss the RfG during the ACER review	Olaf Islei	Complete
31	Update group if ENTSO-E publish a revised draft of the RfG Network Code	NGET	Complete
32	Raise the following issues with ENTSO-E: <ul style="list-style-type: none"> Stakeholder engagement, and whether best practice can be learnt from ENTSOG There is a lack of engagement with the Smart Grid community as part of the DCC consultation Clarification on the alignment of the timings of the three System Operation Network Codes 	NGET	New
33	Restructure the JESG Website to highlight documents such as the comparisons between the European Network Codes and existing GB Codes	Paul Wakeley	New
34	Attendees at RfG workshops should attend prepared with their list of top 'key issues'	All	New
35	Write to ENTSO-E, ACER and the Commission to indicate that the JESG believes that the number and scope of changes in the RfG Network Code following the consultation warrants further consultation	Barbara Vest	New

36	<p>Arrange or rearrange JESG workshops, where possible, as follows:</p> <ul style="list-style-type: none"> • Extend the RFG workshop over two days • Move the DCC workshop later in the consultation period (mid August) • Add workshop during the consultation for Operational Security (Mid October) • Add workshop during the consultation for Operational Scheduling and Planning (Mid December) • Add workshop for discussion of final CACM (Mid October) 	Paul Wakeley	New
37	Forward specific items that stakeholders would like to be discussed relating to the Operational Security Network Code at the August JESG to the technical secretary by the end of July.	All	New
38	Forward specific items that stakeholders would like to be discussed relating to the Operational Planning and Scheduling Network Code at the August JESG to the technical secretary by the end of July.	All	New
39	Circulate the table of requirements for types of generators as referenced in Section 5 of the 2 May ENTSO-E RFG User Group Minutes	Tom Ireland	New
40	What guidance is provided on how national choices within the RFG Network Code may be taken? For example, must due regard be made of neighbours choices to ensure harmonisation.		
41	Verify the meaning / impact of mandatory vs non-mandatory, and principles in the RFG Network Code	Tom Ireland	New
42	For each Network Code a comparison document between the Network Code and existing GB Codes will be produced.	NGET	Ongoing
43	Verify from ENTSO-E what process was followed to address 'Call for Evidence' responses especially the response from CECED.	Dwayne Shann	New
44	Circulate details of the JESG to the distribution trade associations list to invite interested parties	David Spillett / 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 Network Code to resolve issues? Need a strategic view of the Network Codes but not sure which is the best place to do this.
6.	How is consistency and interoperability being ensured across the Network Codes?
7.	Can the final Network Code to be produced be used to correct errors / inconsistencies in earlier Network Codes?
8.	What is the expected frequency for changes to the Network Codes once implemented? The minutes of the Operational Security Network Code Public Workshop (20/4/12) indicate that a 'frequency of 4-5 years' 'might be needed'.

Balancing Issues Log

Last updated: 14 June 2012

Issue No	Issue	NGET View
1.	There is a need to understand the implication of the Framework Guidelines on the current GB market and ongoing changes.	

CACM Issues Log

Last updated: 22 May 2012

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.	Will there be penalties for errors in the data taken at D-2? For example wind may require a larger margin of error	The code puts a best endeavours requirement on industry participants.
4.	Who can instigate the process for changing bidding zones?	This can be instigated by ACER, the NRA or the TSO
5.	Bidding zones decided by NRAs and TSOs not just National Grid as they cross boundaries so it will have to involve several parties. How will this process work?	
6.	What is the Regional process for changing bidding zones	Ofgem view- this has not been decided yet
7.	Implementation timescales: There were concerns over the various timescales in the network code, and how these interacted with the "it shall apply" date of 1 September 2014 in Article 101. ENTSO-E acknowledged that Article 101 and the timescales in the code need to be improved in the next version.	NG agree and will seek to get this text removed from the final network code.
8.	Consultation: In various places the code requires consultation, but does not say between whom. This is an oversight and the code should say market participants. This either needs to be addressed explicitly through wording in each article, or covered in the definitions by turning consultation into a defined term that includes consultation with appropriate market participants.	NG agree and will seek to get the final network code modded appropriately.
9.	Publication / Transparency: In various places the code does not state that information passed between SOs and NRAs, and certain information generated by SOs needs to be published. It was suggested that a general caveat be included that all such information be published unless explicitly noted.	NG agree and will seek to get the final network code modded appropriately.

10.	<p>Third parties. In various places the TSOs are permitted to appoint third parties. It was noted that this should be subject to NRA approval, and subject to usual procurement law.</p>	NG agree and will seek to get the final network code modded appropriately.
11.	<p>Definitions: The definitions of a number of key terms were discussed. Examples include <i>Force Majeure</i>, <i>Emergency Situation</i> and <i>Social Welfare</i> and <i>Market Time Period</i>. As these are key to particular aspects of the code, it is essential that these terms are defined consistently and appropriately in this network code and across the codes.</p>	NG agree and will seek to get the final network code modded appropriately.
12.	<p>Harmonisation. It was suggested that there harmonisation of the timings of the publication of results should be considered. This might avoid perverse market behaviour if results from some regions were published before others.</p>	NG agree and will seek to get the final network code modded appropriately.
13.	<p>Governance. The Governance process for the network code is covered by the Commission in their Governance Guideline. There were a number of comments:</p> <ul style="list-style-type: none"> • National Regulatory Authorities (NRA) agreement: The question of what happens if two or more NRA do not agree was raised. The solution is found in Regulation (EC) 713/2009 which gives ACER dispute resolution powers if NRAs do not agree on cross-border issues. This could have the consequence that a regional issue affecting a small number of TSOs is decided upon by ACER through an appropriate voting mechanism. • TSO agreement: The question of what happens if two or more TSOs do not agree was raised. This is not yet defined, although ENTSO-E are likely to play a role. 	This is to be covered in the Governance Guidelines which is specifically out of scope of the CACM network code.
14.	<p>Criteria / objectives. Many processes in the code have their own separate set of criteria or objectives. It was suggested a reference could be made to a central set of criteria or objectives, which are vested in the objectives states in Regulation (EC) 713/2009.</p>	NG agree and will seek to get the final network code modded appropriately.
15.	<p>Carve Outs. In the code there are a number of 'carve outs' designed for specific countries, e.g. Article 38, allows Norway to redistribute its bidding zone more quickly than the standard process. However, the necessity of drafting law is that Article cannot be defined to apply to only some countries, so there were concerns that the carve outs might have unintended consequences.</p>	NG agree and will seek to tighten the network code where possible. However carve outs are likely to remain to cater for the differences between countries.

16.	Interaction with Balancing: There was some concern over the interaction of the Intraday market and the Balancing regime. In particular, different bidding zones could have different market time periods. Market time periods do not necessarily have to align with settlement periods. This shall need verifying and considering with the team writing the Balancing Code.	NG agree and have notified the relevant NG members on the drafting teams.
17.	Implementation: There was a concern that the existing timelines may not allow market players sufficient time to adapt to the requirements of the code (e.g. data provision).	NG agree and will seek to get the final network code modded appropriately.
18.	D-2 Data Requirements: The impact on market participants of having to supply (as yet unspecified) data at D-2, rather than the current regime of D-1 data. New IT systems may be required and these have a lead time.	
19.	Non-Costly Actions: There was a question as to whether the term 'non-costly' actions is the correct wording. As defined these actions are 'non-costly' to the TSO, but there may be costs on market participants.	
20.	Flow-based: Globally there is little experience of using flow based analysis, therefore experience of the full implications of the model is still being gained through the current trials.	Agreed
21.	Bidding zone amendments: the amendment of bidding zones articles needs to be tightened as currently TSOs can launch reviews in areas outside their control area, i.e. it should be clear where the jurisdiction of individual TSOs extends.	NG agree and will seek to get the final network code modded appropriately.

DCC Issues Log

Last updated: 14 June 2012

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 Planning and Scheduling Issues Log

Last updated: 14 June 2012

Issue No	Issue	NGET View
1.	Can NGET provide an indicative list of Power Stations in GB which may be impacted by this code.	

Operational Security Issues Log

Last updated: 14 June 2012

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.
4.	Relating to the Minutes of the ENTSO-E Workshop with the DSOs Technical Expert Group (20 April 2012), what is meant by 'must-run synchronous generations' in A1 on Page 3.	The issue was raised by a DSO at workshop #1: what is the minimum level of synchronous generation that can be allowed, to ensure minimum system inertia and stability are ensured? The drafting team reflected on this comment and decided that this requirement should have been addressed in the Code. The next draft of the Op Security NC which will be released ahead of workshop #2 on 2/7/12 will contain a clause requiring 'each TSO to specify the minimum % of synchronous generation required at any time to maintain system stability, the methodology to determine the levels shall be defined and agreed by entso-e for each synchronous area.'

RfG Issues Log

Last updated: 1 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. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
2	Has “significant” been interpreted correctly?	NGET and ENTSOE believe it has, ACER has indicated no concerns with this, to date. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
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. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remains
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. Item closed – GB stakeholders invited to respond to ENTSOE
5	Definitions for Generating Unit is ambiguous	Feedback was taken on board prior to the 24 th January consultation being published – and definition amended, in line with previous comments. Some parties still felt that ambiguity remains. Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remains
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. Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remains
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. Item closed - GB stakeholders invited to respond to ENTSOE if further concerns remain

8	Which parameters/obligations change/will not change/may change?	See item 11. Item Open
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. Item closed
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. Item closed – GB stakeholder invited to respond to ENTSOE if further concerns remains
RfG Implementation		
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) Item open Action – 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. Action – 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. Item closed – GB stakeholders invited to respond to ENTSOE
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 Issue Open - Action – NGET to prepare and circulate timeline clarification

Justification		
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 Issue Open - Action – 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. Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
Retrospectivity		
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 Item closed – GB stakeholders invited to respond to ENTSOE if further concerns remain
18	Can the authority unilaterally apply obligations retrospectively?	No Item closed
Style Drafting approach		
19	RfG drafting is not always clear	Any comments on drafting clarity are very much welcome as part of the Consultation Item closed - GB stakeholders invited to respond to ENTSOE
20	Recitals may require updating	This is one of the items that the ENTSO E legal resource group is in the process of considering Item closed
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). Issue closed
Specific Technical Elements		
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. Issue Open
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. Issue Open
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	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.

	Synthetic Inertia is required will be delegated to the national level.	Issue Open
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. Issue Closed
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. Issue Open
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. Issue Closed
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. Issue Closed
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. Issue Closed
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. Issue Open
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. Issue Open
32	The code forces a formal EON; ION; FON process on us for all generation – ie energization notice,	Issue not discussed at Tech JESG but Slides describing NGET's response have been posted on the JESG webpage.

	initial operation notice, final operation notice. This is 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.	Issue Open
New Issues/ Questions		
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. Item closed – 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. Action – 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. Item closed – 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 vtries of the group, and should be logged for note only. Item closed
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. Item closed
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. Action – 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 Manufacturer/ Performance Data registration with TSOs?	It was confirmed that there is an ongoing initiative to develop a National registration mechanism for GB, perhaps on an accredited third party basis? This is also being considered by other Member States. Issue closed
40	"new requirements not in existing code e.g 92.91 - available power from PPMs"	Issue raised but not discussed Issue Open
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. Issue Closed
42	Can we comment on FaQ and M&A documents during consultation?	Item open Action - 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 Issue Open
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. Issue closed
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. Issue Closed - GB stakeholders invited to respond to ENTSOE
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 Issue Closed - GB stakeholders invited to respond to ENTSOE
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 Issue Open

48	Article 2 definitions e.g. control area derogations do they work across other codes?	Issue raised but not discussed Issue Open
49	Commentary on justification FG 2.1. Final paragraph	Issue Open
50	Is it worth undertaking a GB Cost Collection/collation activity now? To aid any future CBA	No decision made at this time Issue Open
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. Issue Open Action – NGET to feed back to ENTSOE
52	OFGEM and DECC are representing GB and N. Ireland	Point noted Issue Closed