Headline Report

Meeting name	Joint European Standing Group (JESG)
Meeting number	14
Date of meeting	15 January 2012
Location	Elexon, London

This note sets out the headlines of the most recent meeting of the Joint European Standing Group (JESG). The note is provided in addition to the presentations from the meeting which are available on the JESG website[1].

The meeting was chaired by Garth Graham as the Chair of the JESG, Barbara Vest, had sent her apologies.

1.   Issues Log Review.
The issues logs were updated, as required, as each Network Code was discussed.
The current version of the issue log for each of the Network Code being drafted by ENTSO-E is attached to this Headline Report.

2.   Grid Connection Framework Guideline.

Requirements for Generators (RfG)
- ENTSO-E has produced a briefing note on the status of the revisions to the RFG[2].
- The expectation is for ENTSO-E to revise the Network Code, including further Stakeholder engagement in January and February 2013, so that it can be resubmitted to ACER around March 2013. The four areas being addressed are the areas highlighted in the ACER opinion[3].
- Further to JESG Action 100, 6 comments were received from GB Stakeholders on their views of the four areas being revised by ENTSO-E following the ACER Opinion. As agreed at the meeting, this set of comments is to be forwarded to the ENTSO-E drafting team.

Demand Connection Network Code (DCC)
- The DCC was submitted to ACER on the 4 January 2013. The final version of the Network Code and supporting documents can be found here[4].
- ACER now has three months to provide their opinion on how the Network Code complies with the Grid Connection Framework Guidelines.

HVDC Network Code
- The HVDC Network Code will be drafted under the ACER Framework Guidelines on Grid Connections[5], to provide requirements for transmission circuits using HVDC technology and for HVDC connected offshore Power Park Modules (PPMs) It compliments the RFG and DCC Network Codes which provide requirements for AC connected generation and demand respectively.
- The mandate from the European Commission is expected to be received in early 2013, and at present early scoping of the Network Code is ongoing by the Drafting Team.
- Various configurations of HVDC links, and offshore PPMs are expected to be covered by the Network Code.

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[1]   http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/workingstandinggroups/JointEuroSG/
[2]   https://www.entsoe.eu/fileadmin/user_upload/_library/resources/RfG/121217_-_briefing_note_on_status_NC_RfG.pdf
[3]   http://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2008-2012.pdf
[4]   https://www.entsoe.eu/major-projects/network-code-development/demand-connection/
[5]   http://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Framework_Guidelines/Framework%20Guidelines/FG%20on%20Electricity%20Grid%20Connections.pdf

- There was a significant discussion amongst GB Stakeholders on possible nuances in the configurations, which it was acknowledged will require further considering during the drafting. These nuances included the following scenarios:
  - an initial link to an offshore PPM that is changed from AC to DC, thus changing the requirements on the PPM from those in RFG to those in HVDC,
  - multiple HVDC links to a PPM, with different OFTOs,
  - PPMs connected via HVDC to two different countries (e.g. PPMs connected to an interconnector between synchronous areas),
  - Small island systems connected only via HVDC to the synchronous area,
  - onshore PPMs connected to the grid via HVDC.

3. Capacity Allocation and Congestion Management Framework Guidelines

CACM Network Code
- The ACER Opinion[6] on the CACM Network Code was published on 21 December 2012.
- Ofgem reported that overall ACER considered ENTSO-E to have done a 'good job' in drafting the Network Code, however, they reported that there were 11 areas where it is felt changes were required.
- The Third Package process requires ACER to raise these issues first with ENTSO-E, to provide them with the opportunity to revise the Network Code, rather than sending a qualified recommendation directly to the Commission.
- ACER, ENTSO-E and the Commission are now working together to discuss the necessary wording changes to the Network Code to incorporate ACER's opinion . It is expected that ACER will provide the Commission with the ENTSO-E Network Code and the agreed wording changes to ensure they can recommend the Network Code.
- The process of 'legal scrubbing' was discussed, and it was noted that there may be changes to the Network Code as a result of it being converted to the appropriate language by the Commission. Ofgem considered that the extent of changes may differ for each Network Code.

Forward Capacity Allocation Network Code
The FCA Network Code was not discussed at this month's JESG.

4. Electricity Balancing Network Code
- ENTSO-E has received the formal mandate letter from the European Commission requesting that they draft a Network Code on Electricity Balancing, based on the Electricity Balancing Framework Guidelines[7]. The Code must be submitted by 1 January 2014.
- The Balancing Network Code was not discussed further at this month's JESG.

5. System Operation Framework Guidelines

Operational Security (OS) Network Code
- The OS Network Code was not discussed at this month's JESG.

Operational Planning and Scheduling (OP&S) Network Code
- The public consultation on the OP&S Network Code closed on 7 January 2013.
- In total 850 comments were received from 21 organisations. ENTSO-E is now reviewing the comments and considering the approach for further revision of the Network Code.
- The OS Network Code was not discussed further at this month's JESG.

Load-Frequency Control and Reserves (LFC&R) Network Code
- The LFC&R Network Code considers the containment and restoration system frequency and appropriate dimensioning of reserves to achieve and maintain satisfactory frequency quality in terms of the frequency deviations from the nominal value and how often these deviations occur within a defined time period.
- The Network Code is currently being prepared by ENTSO-E for public Consultation expected in February and March 2013, including an ENTSO-E workshop on 12 March in Brussels.

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[6]   http://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2010-2012.pdf

[7]   http://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Framework_Guidelines/Framework%20Guidelines/Framework%20Guidelines%20on%20Electricity%20Balancing.pdf

- It was noted that different terminology is used in the Network Code compared to GB, however, the approach taken in the drafting was to maintain an approach that is consistent with current GB requirements, in terms of technical requirements and parameters.
- The Code does not use the term Significant Grid User, but instead uses Reserve Provider. Exactly who is a Reserve Provider is not defined in the Network Code and will need some further thought particularly around domestic providers (see Demand Connection Code), and the obligations placed on them by the LFR&C Network Code.
- Requirements in the Network Code are written for the control hierarchy within Europe, including monitoring areas, control areas, control blocks and synchronous areas. Within GB, NGET is the NETSOs for the entire Synchronous Area and this is expected to remain the case, however, there are multiple TSOs (SHET, SPTL, OFTOs and Interconnectors) and this will require some further consideration.
- The LFC&R Network Code will have a strong interaction with the Balancing Code, which will define the cash flows, products and markets for the services outlined in the LFC&R.

6. Transparency Regulations

- As part of the Third Energy Package[8], the European Commission has developed the Transparency Regulations[9]. The Transparency Regulations specify a minimum common set of data that needs to be available to market participants across all member states.
- The regulation will require a central collection and publication of data, with a role for ENTSO-E in providing the common transparency platform.
- At a meeting of member states on 12 December 2012, the Transparency Regulations were agreed. The second stage of Comitology is expected to last six month and consists of scrutiny by the European Parliament and European Council. The Council and the Parliament have the vires to veto the proposed text but not to propose any amendments. Therefore, Ofgem does not anticipate that the text will be amended further.
- The Transparency Regulation is expected to become an Annex to Regulation 714/2009, and will have the same legal status as the Network Code once these are complete.
- A Manual of Procedures specifying details and format for submission of data will be developed by ENTSO-E after the regulation comes into force. John Lucas, Elexon, has been appointed to the ENTSO-E Transparency Platform Expert Group. The Expert Group is tasked with advising ENTSO-E on the development of the Manual of Procedures. Other GB Stakeholders are invited to engage with John with their views – john.lucas[at]elexon.co.uk, 020 7380 4345.

7. Forthcoming events/workshops

Details of forthcoming JESG events and workshops are maintained on the website:
http://www.nationalgrid.com/uk/Electricity/NetworkCodes/systemNetworkCode/workingstandinggroups/JointEuroSG/

Details of forthcoming relevant public events for ENTSO-E, ACER and Ofgem are recorded in the Agenda for this meeting, and on their respective websites:
- ENTSO-E: https://www.entsoe.eu./resources/network-Network Codes/
- ACER: http://acer.europa.net
- Ofgem: http://www.ofgem.gov.uk/Europe/stakeholder-group/Pages/index.aspx

8. Next meeting

The next scheduled meeting for the JESG is 20 February 2013 at Elexon, London.

The actions log and issues logs follow this report.

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[8] Regulation 714/2009, Article 15 – 'Provision of Information'.
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF
[9] http://ec.europa.eu/energy/gas_electricity/doc/el_cross-border_committee/20121220_transparency_regulation_after_comp_and_informal_committee_meeting_v6_final_voting_cleaned.pdf

Generic Issues Log

New items are marked in grey.

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'.
9.	There should be a general clause in each of the Network Codes to require consultation and NRA approval for elements which are to be defined after the Network Code has entered in to force. Such a condition has been included in the CACM Network Code.
10.	The definition of TSOs in the Network Code may lead to ambiguity due to the certification of additional companies in GB as TSOs (e.g. Interconnectors and OFTOs)
11.	There are various data and information flows defined in various Network Codes which are not obviously consistent. This remains a major concern for the Industry due to changes to processes and infrastructure that will be required to provide this data.
12.	What happens when notifications are provided to the TSO / Relevant Network Operator. Does the TSO have a duty to act upon the notifications? What if they do not comply?
13.	The contractual / market impact of demand side response for domestic customers has not been considered. The DCC and LFR&C Network Codes both deal with capability without outlining how the market will work in practice. Who is the most appropriate part in the UK to have a relationship with the customer for demand side response.
14.	Supplier may be moved to an 'out of balance' position by demand actions taken by the Aggregator / DSO / TSO. This impact on the balancing arrangements will need to be considered.
15.	There are different definitions for 'Significant Grid User' in a number of the Network Codes, so the applicability of the Network Codes to individual users is not clear.
16.	If the term 'Transmission Connected' is used within the Network Codes this will led to discrepancies within Europe and within the UK, and there is no single voltage above which Networks are considered Transmission (e.g. within GB, Transmission in Scotland is at or above 132 kV, whilst in England and Wales it is at or above 275 kV)
17.	**Implementation:** Can areas of the GB Code changed to comply with the ENCs be modified through the normal GB governance arrangements, provided it does not affect compliance with the ENCs?
18.	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?
19.	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?

JESG Actions

Last Updated: 16 January 2013

Open, Ongoing and New Actions

Action No	Action	Lead Party	Status	Update
42	For each Network Code a comparison document between the Network Code and existing GB Codes will be produced.	NGET	Ongoing	
67	Clarify with Sue Harrison what input DECC expects to need during Comitology for the RFG Network Code Addition 19 Sep: Discuss with DECC how the pre-comitology stage might be taken forward	BV	Ongoing	BV is having an open dialogue with DECC to determine the process. BV/GG met with DECC and said that GB Stakeholders were willing to support DECC through Comitology as required, including providing article-by-article comments on the RFG. There is likely to be some subgroup of the DECC/Ofgem Stakeholder Meeting to consider issues for Comitology Future update will be provided to JESG
95	Arrange a meeting between Barbara Vest, Nick Winser/Mike Calviou, Graham Steele and Ofgem to discuss concerns over Network Code development process, ENTSO-E & ENTSO-G relationship and Stakeholder Engagement.	BV/NGET	Ongoing	In progress
96	Contact large industrial customer regarding the DCC to ensure they are involved, including Chemical Industries Association, Mineral Products Association, Energy Intensive Users Group, Major Energy Users Council, EEF, BEAMA, SEDC. Update (6/12): Continue to engage with contacts at EIUG (Andrew Bainbridge) and MEUC (Jeremy Nicholson)	BV	Ongoing	Initial contact continues to be made with a variety of organisations.
98	JESG to write to European Trade Associations to highlight GB Stakeholder's disappointment at their poor engagement with ENTSO-E on the revisions on the RFG Network Code following ACERs opinion (particularly highlighting 22/11 User Group), and to seek how GB views can better be represented through these forums.	BV	Ongoing	
99	JESG to write to ENTSO-E to highlight continued issues with the Stakeholder engagement process. It being noted that the GB has a strong history of constructive stakeholder engagement, and GB stakeholders want to be engaged in the development of the European Network Codes. BV is also looking to meet with ENTSO-E (possibly on 18 January 2013), to discuss these matters, and feedback on the RFG revisions further.	BV	Ongoing	Update 16/01: Topics to include are problem associated with the ENTSO-E consultation tool (Action 79), and the need to publish material to all stakeholders on an equitable basis.
103	Revise the "Status of Development of European Electricity Network Codes" timelines, to include relevant other material such as the Transparency Regulations.	NGET	**New**	
104	Provide an update on the impact of the Transparency Regulations to GB	NGET	**New**	

Action No	Action	Lead Party	Status	Update
105	Provide an update on the potential implementation mechanism for the Transparency Regulations including the possible interaction with REMIT	Ofgem	**New**	
106	Forward the GB Stakeholder comments on the RFG revisions collated under Action 100 to ENTSO-E ASAP	GG / Chair	**New**	
107	Confirm the date of the ENTSO-E public workshop on the LFR&C	NGET	**New**	Confirmed by ENTSO-E as 12 March 2013.
108	Consider revising the date of the LFC&R Workshop to 19 March (pm) and 20 March (all day), so that is occurs after the rescheduled ENTSO-E public workshop	NGET	**New**	
109	Provide input to John Lucas, Elexon on the development of the Manual of Procedures by ENTSO-E under the Transparency Regulations. [john.lucas@elexon.co.uk, 020 7380 4345]	All	**New**	

Actions closed at, or prior to, the January 2013 JESG Meeting

Action No	Action	Lead Party	Status	Update
79	JESG to write to ENTSO-E to highlight the difficulties stakeholders have in the use of the web tool for capturing Consultation comments Update (7/11): ENTSO-E has reported the tool has been updated. Feedback is welcomed on the updates to the tool.	Chair / Mike Kay All	**Closed**	Reply previously circulated. Update 7/11: James Bradley from ENTSO-E noted that changes had been made to the Consultation tool, including the ability to upload an Excel file, in advance of the consultation on the OP&S Network Code. Update 6/12: JESG will feedback on latest consultation tool after OP&S. Update 16/01: Verbal feedback at the January JESG reported that there were still major problems with the consultation system, and that the system of uploading an excel file was flawed to such an extent as to make it unworkable. This is to be feedback to ENTSO-E as part of Action 99.
82	Review DCC Issues Log from a retail perspective	Rosie McGlynn	**Closed**	This issue has been superseded, as the Issue Log is now subject to prioritisation by all GB Stakeholders at the DECC/Ofgem stakeholder meeting on 16 January.
100	Provide comments on the four areas of the RFG Network Code which are being revised by ENTSO-E following ACER Opinion by 8 January 2013. These will be consolidated at the next JESG meeting and passed to ENTSO-E (see Action 99).	All	**Closed**	This issue has expired, and issue will be discussed at the JESG Meeting (please refer to the Headline report)

Action No	Action	Lead Party	Status	Update
101	Circulate names of the HVDC drafting team	NGET	**Closed**	The members of the ENTSO-E drafting team for HVDC are:

Name	Company	Country
Edwin Haesen	ENTSO-E Secrtariat	-
Kent Hans Søbrink	Energinet.dk	Denmark
Pascal Bertolini	RTE	France
Thomas Ahndorf	TransnetBW	Germany
Volker Vahrenholt	50HertzTransmission	Germany
Wilhelm Winter	TenneT TSO GmbH	Germany
Salim Temtem	Eirgrid	Ireland
Corrado Gadaleta	Terna	Italy
Bart van Hulst	TenneT TSO B.V.	Netherlands
Ulf Baur	Statnett	Norway
Carmen Longás	REE	Spain
Anders Danell	Svenska Kraftnät	Sweden
Darren Chan	National Grid	UK

Action No	Action	Lead Party	Status	Update
102	Provide comments on the Draft Transparency Regulations to DECC as per Steve Davies email (which was circulated to members) by 7 December 2013.	All	**Closed**	This issue has been expired. The transparency regulations have now entered Comitology.

Forward Capacity Allocation

Last updated: 10 December 2012

Issue No	Issue	NGET View
1.	Do the data submission requirements for FCA overlap with the OP&S code?	The current ENTSO-E view is that yes they do. This has been highlighted to the lead of the capacity calculation drafting team and will be factored in when writing the data methodology specification.

Balancing Issues Log

Last updated: 15 December 2013

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.	Now the Framework Guidelines have been finalised, the Network Code is being developed. Once the requirements in the Network Code become clearer, it will be possible to determine further the implications for the GB market.
2.	Which definition of 'Control Area' is the Balancing Network Code expected to be used. Is it the market definition in CACM, or the technical definition in LFR&C, as the Balancing Code interacts with both of these Codes.	Drafting is at an early stage, and consideration will be given by the Drafting Team to ensure the appropriate definitions are used in the Balancing Network Code.

HVDC Issues Log

Last updated: 15 January 2013

Issue No	Issue	NGET View
1.	Why do the requirements for PPMs only extend to those connected Offshore? There is potential for Onshore PPMs to be connected only via HVDC	Drafting is at a very early stage and consideration of this and other issues will be taken by the drafting team.
2.	How will a small island be considered, if it is connected to the Synchronous Area only by HVDC? In the extreme case, GB is an island connected via HVDC to the European Synchronous Area, so a form of words need to be found to ensure requirements are placed on the right parties	Drafting is at a very early stage and consideration of this and other issues will be taken by the drafting team.
3.	Consideration needs to be given to the various configurations of PPMS and HVDC networks, to ensure that obligations are fair and transparent.	Drafting is at a very early stage and consideration of this and other issues will be taken by the drafting team.

Operational Security Issues Log

Updated: 8 November 2012

Issues numbered 8 to 33 were captured at the JESG OS Technical Workshop on 3 & 4 October.

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 change.
2.	What is the changes for GB, what is the cost benefits	When the Network Code is further developed we will also have a position paper which should provide justification / cost benefit for new obligations in the OS NC. NGET 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 Network 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.'
5.	Do the requirements of the Network Code apply to AC or DC cross-border interconnections?	The draft OS NC is not specific on AC or DC, so obligations regarding interconnections would therefore apply to both AC or DC.
6.	The methodology to determine the minimum percentage of synchronous generation to enable stability and security required in a synchronous area should be subject to consultation and NRA approval.	No strong views. National Grid already has an obligation under the GB SQSS to ensure the system is operated to ensure angular stability and frequency stability, this methodology would be one of many inputs into ensuring stability of operations.
7.	There could potentially be multiple definitions / criteria of a 'significant user' in the RFG, DCC and OS Network Codes. Can a different terminology be used.	The term significant does require consistency across the Network Codes, before they are finalised.

Issue No	Issue	NGET View
8.	**Article 3(3) – NRA approval process:** Article 3(3) does not provide an appropriate process for public consultation, NRA approval or appeal. Appropriate NRA oversight and public consultation should be the default whenever items in the Network Code are left to be determined at a later stage. Article 3(3) in this Network Code is a watered-down version of Article 4(3) in the final NC RFG and draft NC DCC, and is different to the regulatory approval process in NC CACM.	The NRA approval in the NC OS was changed prior to the consultation during legal drafting, and it is acknowledged that it does not align with those in other Network Codes. Please respond to the consultation with specific comments on how you would like the article revised.
9.	**Nature of requirements:** The Network Code makes repeated use of the term '*endeavour*' for requirements placed on TSOs. In contrast, the NC DCC and NC RFG place specific and binding obligations on Users. Why is there this difference in the nature of the requirements for demand/generation Grid Users vs TSOs?	The NC OS is an operational Network Code therefore it is not always possible to define definitive parameters and obligations when specifying how the system should be operated. The NC DCC and NC RFG deal primarily with design capability of demand and generation facilities to be connected to the system, and therefore more specific design parameters are appropriate. Areas where the requirement in the NC OS can either be strengthened for the TSOs or relaxed for industry parties should be raised through the ENTSO-E consultation.
10.	**Justification for requirements:** Where there is a deviation from current practice, ENTSO-E is required to provide a cost benefit analysis demonstrating why the requirement has been chosen to ensure they are proportionate. These have not been provided. Specific areas where the requirements are considering disproportionate or potentially prohibitive are in Issues 0-0, 28 and 30.	Justification is provided in part in the supporting paper; further justification is expected to be provided as the Code is finalised. Specific areas where obligations are felt disproportionate should be fed back through the Consultation.
11.	**Requirements on small generators.** The provision of real-time and forecast data from Type B and C generators with embedded DSO connections at 1MW and above. Clarification that according to the RfG code any generator connected at 110kV or above is type D.	See Issue 10 Believe the intent is obligation is on Significant Grid Users and which are type B or C. RfG code definition of type D being all transmission connected irrespective of size hinges on whether any European system includes transmission facilities at <110kV. Please feedback concerns in Consultation document.
12.	**Domestic Demand Side Response.** As the NC DCC provides a capability for demand side response to be provided by domestic customers, the impact of placing obligations on Demand Facilities in this Network Code need to be verified to ensure it is proportionate.	See Issue 10
13.	**Data Requirements.** The TSOs may require various elements of data from DSOs and grid users; these requirements are not justified.	See Issue 10
14.	**Proportionality of Requirements on DSOs.** There are a number of requirements placed on DSOs by the Network Code; however, these are felt to be disproportionate and unfunded. It is not clear if DSOs could meet with requirements in the Network Code without large investment.	See Issue 10

Issue No	Issue	NGET View
15.	**Applicability – Significant Grid Users.** As the Network Code is written to apply to 'significant grid users' and what constitutes a significant grid user is for TSOs to determine after the entry into force of the Network Code (Article 6(11)), it is very difficult to ascertain who is impacted by this Network Code.	Who is a 'Significant Grid User' may change over time as system conditions change, and will be defined in accordance with the process established in the Network Code. NGET initially expects 'Significant Grid Users' to be those currently affected by the Grid Code for data provision; however, this may change in light of current workgroups eg. on providing information from embedded generation.
16.	**Applicability - All Grid Users.** The drafting needs to be tightened to ensure that it does not place undue obligations on parties by using terms such as 'Demand Facilities', 'Power Generating Facilities' and 'All Grid Users', which covers everyone rather than those deemed significant.	It is not believed that this term should be used in this Network Code; the drafting needs to be improved.
17.	**Lack of technical detail/parameters.** The Network Code is lacking in specific technical parameters and specifies that these will be determined later by the TSOs. In general the requirements in the Network Code are somewhat vague compared to GB Network Codes.	The intent of the NC OS was to provide an 'umbrella' code for harmonisation of principles, NGET would see parameters such as those for voltage and frequency, if defined in the Network Code, to be the same as those currently in GB frameworks such as the SQSS and Grid Code. Certain parameters such as the thermal ratings and short circuit ratings may not be appropriate to be codified in this manner due to their being circuit and asset specific.
18.	**ACER requirement for further detail.** ACER wrote to ENTSO-E on 30 August stating that the Network Code as currently drafted did not meet the Framework Guidelines, due to an absence of Performance Indicators. These will need to be added post-consultation and hence the public will not have the opportunity to comment upon them.	The letter was too late to be considered prior to the consultation period drafting. Future development of the Network Code will be subject to the process specified in the regulations and as agreed between ACER, ENTSO-E and the Commission. It does not presently allow for a second consultation.
19.	**Terminology:** In specifying requirements, the Network Code uses it a unique definition of 'Significant Grid User', but also refers to the generator types from the RFG, and units which are 'relevant for Operational Security". It is not clear how all of these definitions interact and whether they are consistent.	The definition of Significant Grid User is unique to this code. The applicability of the Network Code shall need to be clarified to ensure that that intent is reflected in the final drafting.
20.	**Terminology.** The use of various terms such as Control Area, Responsibility Area and Observability Area need to be checked to ensure the obligations are being placed on the parties who can actually deliver the requirement.	The applicability of the Network Code shall need to be revised to ensure that that intent is reflected in the drafting. It is believed that Control Area = Responsibility area, this needs to be considered in the final drafting.
21.	**Consistency / duplication.** Each Network Code will have the same legal status; therefore there can not be duplication of requirements between Network Codes. Various terms and processes are used in various Network Codes with different meanings e.g. Common Grid Model and Remedial Actions are both defined in NC CACM; data exchange is also defined in CACM, Remit and Transparency regulations.	There is a need to improve the referencing and interactions between Network Codes.
22.	**Interaction with Future Network Codes:** If market aspects are not defined in the NC OS, but are expected to be covered in the future NC Balancing, then this needs to be referenced in the NC OS.	There is a need to improve the referencing and interactions between Network Codes.

Issue No	Issue	NGET View
23.	**NC RFG – Retrospectivity.** Various elements of the NC OS refer to generators being obliged to meet the obligation of the NC RFG. The NC RFG does not be default apply to existing generators, whereas the NC OS does. It is not clear how this interaction works for existing generators not covered by the NC RFG.	The drafting needs to be tightened to reflect the intent. It is not intended to require parties to comply with the NC RFG unless they are already required to do so.
24.	**Different definition of Significant Grid User.** The term is used repeatedly across the Network Codes although the definition and hence who is captured as a Significant Grid User varies between the codes. Common definitions are required to ensure common obligations.	It is likely that what constitutes a Significant User for Operational Security (eg provision of data) will be different from that for the other Codes which deal with design capability. Therefore, different thresholds may need to be applied. It is acknowledged that this can lead to confusion amongst parties. Specific comments on how this issue could be addressed should be fed back through the consultation tool.
25.	**Capabilities.** The NC OS specifies requirements based on capabilities defined in other Network Codes (for example the NC DCC). It needs to be assured that requirements for system operation are compatible with the capability of plant provided under the other Network Codes.	The requirements in the OS Network Code shall need to be compared for consistency against the other Network Codes when they are finalised. Specific comments should be fed back through the Consultation tool.
26.	**Redispatch (Article 10(6-9)).** From the drafting it is not clear how the TSO redispatch allowed in Article 10 interacts with the NC Balancing and how this redispatch will be used. Redispatch is a defined term in the NC while Dispatch is not.	There is a need to improve the referencing and interactions between Network Codes and in particular the Balancing Code once it enters drafting.
27.	**Dispute Resolution.** No mechanism is provided in the Network Code for resolving disputes between two or more parties that are required to agree or cooperate.	Please feed back any specific suggestions you might have on this issue.
28.	**Resynchronisation (Article 11(20)).** The process defined in this article is unworkable, and places unachievable obligations on generators and DSOs.	The article is we consider intended to apply in an emergency situation, however, we acknowledge this is not clear. The drafting needs to be improved to match the intent and how this would actually work in practice including process and timing.
29.	**Minimum % of synchronous generation (Article 13(4))** A percentage of synchronous generation may be too simplistic as it does not recognise the range of inertia provided by different synchronous plant.	It is agreed that this Article needs some refinement to make it more generic. Please make specific suggestions via the Consultation tool.
30.	**Testing obligations.** Article 14(11) does not specify how often such testing may be requested, whether this constitutes an obligation upon Users and who should pay for it. If mandatory there needs to be an appeal regime where testing becomes too onerous.	Please make specific suggestions via the Consultation tool.
31.	**Alert Status.** Article 6(7) requires the TSO to communicate entry into an Emergency state to Users; consideration to be given to communicating 'Alert' status too as this would mean suspension of testing as under article 14(12).	'Alert' status is usually triggered by a secured event and is very rarely followed by any further system degradation since this would usually be triggered by a specific further contingent event. However, please advise via the Consultation tool.
32.	**Data Aggregation.** Under article 10(12), who aggregates data submitted to the TSO?	Not clear in drafting; but unlikely to be possible by any party other than DSO.

Issue No	Issue	NGET View
33.	**Expansive Actions.** Under article 11(2) for contingency handling & analysis – no definition of what an expansive action would be.	Intent of drafting is to clarify TSO duties. Please make specific suggestions via the Consultation tool for improvements to wording.

Operational Planning and Scheduling Issues Log

Last updated: 15 January 2012

Issues 4 – 12 were captured at the Technical Workshop on 17 December.

ID	Issues	NGET View
1.	Can NGET provide an indicative list of Power Stations in GB which may be impacted by this code?	The code discusses what information will be required and from whom but gives a deadline of 3 months after the code comes into force. Therefore at present it is not possible to provide an indicative list.
2.	What is the definition of 'Scheduling' within the Network Code?	Provides TSO with information on the market position prior to real time to allow TSOs to take action(s) if necessary to balance the system in real time
3.	How can planned outages be changed, after they have been submitted at 'year ahead'?	This is still under discussion but most likely there will be no change for GB from how it is carried out at the moment.
4.	**Data Provision/harmonisation of dates.** Relevant Users may need to provide additional data to support the planning and scheduling requirements of this Network Code. Moreover, as the European planning year-ahead is based on a calendar year, data submission may be required at a different time from that currently required for GB purposes (where the year starts in April) and covering a different period.	The GB calendar for scheduling is a minority in Europe, so it is almost certain we must align with the European calendar. The provisions of the code only apply to users and elements defined as relevant for cross-border system operation issues.
5.	**Timescales for determining methodologies.** Various methodologies, platforms and processes need to be determined once the Network Code has entered into force. Each of these requirements has a timescale, which varies between 3 and 24 months and is often contingent, without any clear rationale for this timing. For example, Article 21 must be completed within 3 months, but is based on the methodology determined in Article 18 which has a 24 month period for completion.	Acknowledged. The timescales in the document can be improved.
6.	**Role of ACER & ENTSO-E.** The Network Code places obligations and requirements on ACER and ENTSO-E. This is change to previous Network Codes where obligations have not previously been placed on ACER and ENTSO-E which are beyond their legal competencies established in the Regulations.	This construction is based on the latest legal advice from ENTSO-E
7.	**NRA Approval.** There is no reference to approval of anything by NRAs. Article 3(3) and within the Network Code the term *consult* is used instead.	This construction is based on the latest legal advice from ENTSO-E
8.	**Interaction with CACM.** The CACM Network Code requires Common Grid Models to be determined at specific times for the purposes of operating the market. Although the output of the OP&S Network Code deals with System Security, there is a clear interaction between the models devised under the OP&S (Article 14) and those required for the CACM Network Code.	This is likely to be a matter for individual member states when they implement the OP&S and CACM Network Codes.

ID	Issues	NGET View
9.	**Relevant Users.** Users who are identified as impacting upon cross-border planning and scheduling will face additional obligations under this Network Code. Due to these obligations, their ability to operate in the market may be affected, causing a distortion to the market. An example would be if a generator completed a planned outage early; the user would only be able to reconnect if their 'request' for the adaption of the validated outage plan is approved in line with the change procedure in Article 24. The current arrangements in GB are less stringent.	It is not the intent to distort the market by the Network Code. Please provide specific comments where you feel this may occur.
10.	**Overlap with REMIT[1]**. Market parities have obligations to publish data relating to outages under REMIT. It is not clear how these REMIT obligations match with the requirements in the OP&S, or how changes to the outage plan due to the requirements of the OP&S need to be reported under REMIT obligations.	This has now been considered.
11.	**Forced Outages.** The definition of Forced Outages currently only covers emergency events rather than any 'unplanned' situation. The wording and requirements need to be expanded to cope with the various types of unplanned outages such as those found in the GB framework.	Please submit appropriate comments to clarify your issues and suggest alternative wordings based on GB examples, e.g. Grid Code and CUSC.
12.	**Actions to Achieve/Restore Operational Security.** For example in article 23 (5). These need to either be broader than load-shedding or clarify that load-shedding is only to occur after all other possibilities have been exhausted. Who arbitrates in the case of disputes should be indicated	There will be a general economic & efficient argument to be followed here as in the current GB NETS SQSS. Please submit comments as appropriate.

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[1] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:326:0001:0001:EN:PDF

Load-Frequency Control and Reserves Issues Log

Last updated: 15 January 2013

Issue No	Issue	NGET View
1.	How will the LFR&C Network Code implement sharing of reserves between Synchronous Areas?	The LFR&C Network Code will specify the exchange capability and limits for exchange between synchronous areas and will apply to all HVDC links. The products, market structure and any financial vehicles will be defined in the Balancing Network Code.
2.	Are criteria for determining a credible loss to be included in the Network Code.	The Code places an obligation on the TSO to publish high level methodology statements for determining reserve dimensioning and holding; the current NETSO's operational approach of continual assessment of holding based on risk/cost is expected to continue.
3.	Does this code use the term "Significant Grid User" and what are the obligations on providers in terms of for example categories of generator defined in the RfG?	This Code does not use the term 'Significant Grid User' it uses "Reserve Provider". For some reserve categories there are obligations, for example in terms of detailed information for those units which are reserve providing units greater than 1MW in size. The determination of who qualifies or whether the service is mandatory or optional is not defined in this code. There may be some changes in the data items and frequency of data provision within the code.
4.	Which Grid Users will be captured as being required to comply with the requirements of the LFR&C	The term 'Reserve Provider' is used. There is a prequalification process and items are inferred from the RFG and DCC, but it is acknowledged that it is not explicitly defined. As in Q3 above, the code does not define any obligations and this is left to either the balancing code, local implementation considerations.
5.	Implementation in GB. Appropriate terminology needs to be found in the Network Code to either reflect the single NETSO / multiple TSO arrangement in GB, or to ensure the wording is sufficiently high level to allow the GB model to operate within the constraints of the Network Code.	Noted. National Grid agrees with the position of the JESG. This is a common issue with many Codes it may better to be considered by GB at a higher level.
6.	When will detailed methodology statements for the principles outlined in the code Articles be developed?	There is an requirement from ACER for the code drafting teams to develop high-level methodology statements in parallel to the code drafting and supporting document development. In practice due to the time constraints this will not be done until after the public consultation. It is not clear at this time how detailed or how publicly visible these statements will be. NG expects and hopes that there will be room to develop appropriate local methods in conjunction with industry and regulator.