# nationalgrid

## Headline Report

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| **Meeting name** | Joint European Standing Group (JESG) |
| **Meeting number** | 10 |
| **Date of meeting** | 16 August 2012 |
| **Location** | Shepherd and Wedderburn, Edinburgh |

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 final RFG Network Code and supporting documentation was submitted to ACER on 13 July[1]. From this date, ACER has three months to consider its opinion of how the Network Code fulfils the Framework Guidelines. After this review Comitology is expected.
- A workshop was held on 2 and 3 August to discuss the version of the Network Code submitted to ACER. The workshop covered:
    - A summary of GB Stakeholders' key issues, which may be used to inform DECC during Comitology;
    - A discussion of the potential mechanisms for implementation of the RFG in GB Codes; and
    - A discussion of the tables producing showing the comparison between the RFG and the GB Grid Code.
- The key issues for GB Stakeholders' captured at the workshop were presented at the JESG. This document summarising the key issues will now be owned by the industry and the industry is responsible for liaising with DECC. Barbara Vest agreed to be the custodian of the document.
- Ofgem shared some of ACER's initial thoughts on the Network Code. It was noted that there was a broad range of views amongst European regulators, however, some of the key issues are:
    - Concerns over Article 4(3);
    - The derogation process; and
    - The definition of Significant.

The files from the workshop can be found on the JESG Website:
http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/workingstandinggroups/JointEuroSG/

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

- The Demand Connection Network Code started formal consultation on 27 June. The Consultation closes at 11pm, 12 September 2012. Papers can be downloaded, and consultation responses must be made, via the ENTSO-E website[2].
- The consultation pack includes the Draft Demand Connection Code, Explanatory Note, including evaluation of feedback on the stage 1 'call for stakeholder input', and 'Frequently Asked Questions' including further cost benefit analyses.
- Feedback was provided on the ENTSO-E public workshop. The key issues raised were around the impact on processes if temperature controlled devices respond to system frequency.
- A letter sent (20 Jul) to ENTSOE signed by CECED, Consumer Focus, ESMIG, eu.bac, Eurelectric, Geode, and the SEDC was also discussed. The letter raised: "*Serious concerns*

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[1]    https://www.entsoe.eu/resources/network-codes/requirements-for-generators/
[2]    https://www.entsoe.eu/resources/consultations/

*about the general direction of work now being performed by ENTSO-E with respect to the design of the Demand Connection Code.*". A good dialogue has since happened between the parties and ENTSO-E. ENTSO-E has formally responded to the letter (3 Aug).
- The JESG DCC Workshop will be held on 21 and 22 August. Following some brief summary presentations, the two days will be dedicated to an article-by-article review of the Network Code support by members of the ENTSO-E drafting team.

3. **Capacity Allocation and Congestion Management (CACM) Network Code**
   The CACM Network Code was not discussed at this month's JESG.

4. **System Operation Framework Guidelines**
   There are presently three Network Codes under development under the Framework Guidelines for System Operation (Operational Security, Operational Planning and Scheduling, and Load-Frequency Control and Reserves). The Framework Guidelines also identify further Network Codes to be developed (Staff Training and Certification, Emergency and Restoration, and New Applications), however, development has not started on these Network Codes. An update on two of the Network Codes under development was provided:

   *Operational Security (OS) Network Code*
   - The objectives of the Operational Security Network Code are to:
     o Ensure safe, secure and efficient system operation;
     o Establish common security principles and minimum standards;
     o Facilitates co-ordination between TSOs; and
     o Enable integration of RES and innovative technologies.
   - The Network Code is presently under development by ENTSO-E and is due to be published for public consultation during September and October 2012.
   - The Network Code sets out high level provision for the principals of operations security and is an 'umbrella' document for the other System Operation Codes.
   - The Network Code predominately places obligations on TSOs, but with some on DSOs and Users, plus data provision requirements on these parties. Only high level descriptions of the data requirements are detailed.
   - The terminology used for contingency analysis, and in particular 'N-1', is different from GB usual. Within the Network Code 'N-1' may be defined to refer to a double circuit fault (which is presently termed N-2 in GB).
   - ENTSO-E is aware of a number of Stakeholder concerns with the early drafts of the Network Code and is working to address these concerns. The areas of concern include: definitions, consistency with other Network Codes, the desire for greater NRA approval for methodologies and obligations and to ensure proportionality of responsibilities across the Network Codes.
   - As currently drafted, most of the activities within the OS Network Code are inter TSO or are already part normal practice in GB, and so it is not expected to result in major changes to GB practices.
   - A JESG workshop is planned for the OS Network Code, to coincide with the ENTSO-E public consultation, on the 3 and 4 October.

   *Operational Planning and Scheduling (OP&S) Network Code*
   - The OP&S Network Code focuses on operational planning and scheduling procedures, roles and responsibilities of TSOs and the system users and data exchange in order to ensure meeting the objectives of secure System Operation at the relevant planning phase timeframes.
   - The Network Code is presently under development by ENTSO-E and is due to be published for public consultation during November and December 2012.
   - The following is a summary of the overall purpose of each chapter of the Network Code
     o **Chapter 2 & 3: Security Analysis:** Security analysis is required at relevant stages of the planning process to ensure that system operation is within the normal operating limits of the transmission system and that under N-1 conditions as described in the OS Network Code the frequency, fault level, voltage and load flows etc. remain within predefined limits.
     o **Chapter 4 & 8: Outage Planning and Common TSO Planning Platform:** Setting requirements and roles/responsibilities for every relevant party operating within EU, thereby ensuring a harmonized co-ordination of outages, both internally and cross-border.

- o **Chapter 5: Adequacy:** Ensures and monitors system adequacy, i.e. supplying the load in all the steady states that the power system may face.
  - o **Chapter 6: Ancillary services:** Ensures adequate ancillary services by setting requirements for procurement and management systems.
  - o **Chapter 7: Scheduling:** Provides the TSO valuable insight from all market participants after market closure but before real-time, which enables the TSO to balance the system in real time.
- There is overlap between the OP&S Network Code and other SO Network Codes as well as Grid Connection (RFG, DCC, and HVDC) and Market Codes (CACM and Balancing).
- ENTSO-E is aware of a number of Stakeholder concerns with the early drafts of the Network Code and is working to address these concerns. The areas of concerns include: definitions, the desire for market based solutions, greater DSO involvement, and co-ordination between Network Codes.
- A JESG workshop is planned for the OP&S Network Code, to coincide with the ENTSO-E public consultation, on the 17 and 18 December.

## 5. Feedback from DECC / Ofgem Stakeholder Workshop

- The most recent "DECC-Ofgem Stakeholder Group on EU Network Codes and Framework Guidelines" was held on 18 July.
- At the meeting the following items were discussed:
  - o Update from JESG;
  - o Comitology process;
  - o Update on the tripartite group (DECC, Ofgem and National Grid) on specific discussions on the Network Code process;
  - o Balancing Framework Guidelines;
  - o Update on Planning, Network Codes and Electricity Target Model;
  - o Transparency Guidelines;
  - o Process for implementation of Network Codes in GB.
- The next meeting is scheduled for 29 October. Queries should be directed to Reuben Aitken (Reuben.Aitken@ofgem.gov.uk).

The website for the papers for the group (Action 70) can be found at:
http://www.ofgem.gov.uk/Europe/stakeholder-group/Pages/index.aspx

The slides on GB implementation (Action 66) can be found under the "Presentations from 4th Elec SG" on the above website.

## 6. Forthcoming events/workshops

Details of forthcoming JESG events and workshops are maintained on the website:
http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/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-codes/
- ACER: http://acer.europa.net
- Ofgem: http://www.ofgem.gov.uk/Europe/stakeholder-group/Pages/index.aspx

## 7. Next meeting

The next scheduled meeting for the JESG is 18 September 2012 at Elexon, London.

The actions log and issues logs follow this report.-

## Actions Log

| Action No | Action | Lead Party | Status |
|---|---|---|---|
| 5 | Determine the priority issues within the issues log | Barbara Vest & All | Ongoing |
| 20 | Chair of JESG to write to ENTSO-E to:<br>• request that meetings are not held on Mondays and Fridays, or very near Christmas as it will discourage attendance.<br>• request that a sufficient length of time is provided for consideration of papers prior to meetings (suggested at least 10 days)<br>Peter Bolitho to provide BV with some words on the ENTSOG process | Barbara Vest<br><br><br>Peter Bolitho | Open |
| 42 | For each Network Code a comparison document between the Network Code and existing GB Codes will be produced. | NGET | Ongoing |
| 46 | Provide a steer to the Stakeholder community on how implementation of the Network Codes, such as CACM, is to be timed (i.e. work required in advance of Comitology completing) | Ofgem | Open |
| 49 | Ofgem to consider if a GB Stakeholders on the Transparency Guidelines is required, and what the best process is for arranging such a meeting. | Ofgem | Open |
| 57 | Chair and NGET to discuss feedback on the JESG in advance of September Meeting | BV/CH | **New** |
| 58 | Chair and NGET to discuss and agree dates for JESG meetings in 2013 | BV/PW | **Closed - completed** |
| 59 | Feedback/Queries to ENTSO-E:<br>• Does the consultation tool allow respondents to make comments on the 'Whereas' section of the Network Code?<br>• Has the consultation tool been improved to make it more user friendly?<br>• Highlight the JESG's concerns over the lack of representation from some countries in the Network Code development process<br>• Will ENTSO-E and ACER capture and act upon any 'lessons learnt' as a result of the RFG process | NGET | **New** |
| 60 | JESG DCC Workshop: Update the Agenda to include:<br>• A summary of the ENTSO-E public workshop slides on the three technical areas of the code.<br>• Applicability of the DCC Code | NGET | **New** |
| 61 | Contact BEAMA contacts regarding the forthcoming DCC Workshop | BV | **Closed - completed** |
| 62 | Circulate the Europe-wide industry DCC letter and ENTSO-E response | NGET | **New** |
| 63 | Provide confirmation of the applicability of the RFG and/or DCC to a generator running in power consumption mode | TI/DS | **New** |
| 64 | Provide feedback to JESG on the ENTSO-E process for the DCC post-consultation | NGET | **New** |
| 65 | Circulate a link to the slides on GB implementation provided at the JESG RFG Workshop | NGET | **New** |

| Action No | Action | Lead Party | Status |
|---|---|---|---|
| 66 | Provide feedback on the comparison tables between the RFG and the GB Grid Code | All | **New** |
| 67 | Clarify with Sue Harrison what input DECC expects to need during Comitology for the RFG Network Code | BV | **New** |
| 68 | Responsibility for the RFG GB Stakeholders' key issues document now resides with Barbara Vest. NGET to provide latest version to BV. | NGET | **New** |
| 69 | Provide an update on GB TSO Certification and the interaction with European Codes | Ofgem | **New** |
| 70 | Circulate a link to the meeting note from the DECC / Ofgem Stakeholder Meetings | Ofgem | **New** |
| 71 | Extend the JESG Operational Security Workshop (October) to two days | NGET | **New** |
| 72 | Feedback to ENTSO-E that the proposed date for the post-consultation workshop for the OS Network Code is not conducive to encouraging attendance (presently scheduled for 20 December) | NGET | **New** |
| 73 | Extend the JESG Operational Planning and Scheduling Workshop (December) to two days | NGET | **New** |
| 74 | Feedback to ENTSO-E that the proposed deadline for the end of the OP&S Consultation should be extended to avoid the Christmas Holidays (presently scheduled for 3 January) | NGET | **New** |
| 75 | Report to the JESG on timescales for the information provision detailed in the Network Codes. | Felicity Bush | **New** |
| 76 | Provide an update to the JESG on the individuals / groups that have been contacted by NGET regarding the JESG | NGET | **New** |
| 77 | Add DECC / Ofgem Stakeholder Meetings to the JESG Calendar | NGET | **New** |
| 78 | Provide feedback to Ofgem on the 6/8 NGET letter "Role of the Joint European Standing Group" | All | **New** |

| Action No | Action | Lead Party | Status |
|---|---|---|---|
| **Actions Closed since last meeting** | | | |
| 13 | Ofgem to facilitate the advertisement of JESG to target micro generation | Ofgem | Closed |
| 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 | Closed |
| 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 | Closed |
| 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 | Ongoing |
| 45 | Circulate latest version (16/7) of the CACM Network Code to JESG members. | NGET | Closed |
| 47 | Confirm if the frequency and voltage ranges in Tables 2, 3.1 and 3.2 of the Demand Connection Code are the same as the current GB requirements | NGET | Closed |
| 48 | Feedback to ENTSO-E regarding the lack of clarity in the draft DCC Code, including:<br>• who the Network Code applies to, and how,<br>• the intent of Article 4(3).<br>National Grid will provide clarity on this (by article) for the DCC workshop in August | NGET | Closed |
| 50 | Prepare the calendar for 2013 JESG monthly meetings to be held monthly and by default in London. | NGET | Closed |
| 51 | Circulate details of the expected consultation on Forwards Markets | Will Kirk-Wilson | Closed |
| 52 | Chase tracked changes version of the RFG Network Code from ENTSO-E | NGET | Closed |
| 53 | Amend meeting agenda to make clearer what ENTSO-E meetings are being listed (i.e. public stakeholder workshops only) | NGET | Closed |
| 54 | Feedback from Ofgem / DECC Stakeholder Meeting to be included on the next JESG agenda | NGET | Closed |
| 55 | Send a note around JESG members in advance of the August JESG, regarding meeting up the night before | BV | Closed |
| 56 | Circulate the 20 pages of comments on the OP&S Network Code. | GG | Closed |

The generic issues log can be found on the next page

# 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) |

# DCC Issues Log

**Last updated:** 17 August 2012

New Issues are highlighted with Grey shading.

| 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? | The full format on how to link Transmission, Distribution and Consumers in order to achieve Demand Side Response is out of scope for the DCC. This will be defined at a national level once the code is implemented. |
| 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) | The draft code issued for consultation requires this capability to be mandatory. Responses to the stage 2 consultation will determine if this remains. |
| 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. | DSR has been in place for over ten. Any learning points from such examples have been captured and incorporated in to the network code development to continue to improve response time when providing synthetic inertia. Therefore there is confidence in this technique. |
| 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. | As Issue 3. In addition, DSR also solves the issue with LFDD which at the moment would disconnect embedded generation (PV) and demand counter-acting against the low frequency defence methodology. Hence, a smarter LFDD is desirable. |
| 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 | All requirements in the DCC are derived from the ACER framework guidelines. The big challenge stemming from changes to the profile of generation, is changing demand to be more flexible. |
| 6. | What are the cash flows in the process of DSR? | Unable to comment, as outside the scope of the DCC. |
| 7. | DCC is about TSOs accessing DSR rather than DNOs – is this the correct way forward? | Output in the DCC is based on extensive discussion with the DSO Expert Group. |
| 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? | DCC deals with demand not generation. |

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| 9. | The intention of much of the information in the draft Network Code is not clear. For example Article 4(3) is very unclear, and it is not clear which articles apply to which types of demand (new, existing and sizes) | It is acknowledged that the drafting of the code is not clear in places. There will be an opportunity to discuss the code with the NG Code drafter at the 21/22 August Workshop. Stakeholders should feed their comments to ENTSO-E via the consultation tool. |
| 10. | What consideration has been made of the viability of existing commercial DSR services in light of the requirement to provide mandatory capability in the Network Code? | The Network Code only defines the Capability to provide DSR services. How the market will operate, and hence the viability of existing commercial services, is out of scope for the Network Code. |

# CACM Issues Log

**Last updated:** 17 August 2012

New Issues are highlighted with Grey shading.

| 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. | **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. | NG agree and will seek to get the final network code modded appropriately. |
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| 11. | **Definitions:** The definitions of a number of key terms were discussed. Examples include *Force Majeure, Emergency Situation* and *Social Welfare* and *Market Time Period.* 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. | NG agree and will seek to get the final network code modded appropriately. |
| 12. | **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. | NG agree and will seek to get the final network code modded appropriately. |
| 13. | **Governance.** The Governance process for the network code is covered by the Commission in their Governance Guideline. There were a number of comments:<br><br>• **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.<br>• **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. | **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. | NG agree and will seek to get the final network code modded appropriately. |
| 15. | **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. | 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. |
| 22. | **Force Majeure.** A definition has been introduced into the Network Code. It is not clear how this will interact with national codes and contractual relations. | Discussions are still ongoing within ENTSO-E and comments from GB Stakeholder are welcomed. |
| 23. | **Transitional Intraday Arrangements.** The arrangements for explicit allocation of Intraday Capacity introduced for the France / Germany border may be expanded to other borders, such as France / GB. | This is not yet decided, and we shall continue to work within ENTSO-E to determine whether it is to be permitted. |

# 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 Guidlines on the current GB market and ongoing changes. | |

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## Operational Planning and Scheduling Issues Log

**Last updated:** 17 August 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? | Article 17 of 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 TSO's to take action(s) if necessary to balance the system in real time |
| 3. | How can changes in 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 in the GB position from how it is carried out at the moment. |

# Operational Security Issues Log

**Last updated:** 17 August 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 change. |
| 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. 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 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 Codes, before they are finalised. |