Headline Report

Meeting name	Joint European Standing Group (JESG)
Meeting number	9
Date of meeting	17 July 2012
Location	Saxon Mill, Warwick

This note sets out the headlines of the most recent meeting of the Joint European Standing Group (JESG). 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 reviewed, as required, as each Network Code was presented. The issues log for the RFG Network Code will be distilled as part of the 2/3 August workshop (See Section 2 for further information).

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]. ACER now has three months to consider its opinion of how the Network Code fulfils the Framework Guidelines. After this review Comitology is expected.
- JESG will hold a workshop on 2 and 3 August to discuss the version of the Network Code submitted to ACER. The workshop will:
  - Provide a distillation of the JESG issues log to identify key issues for GB Stakeholders, to inform DECC for Comitology;
  - Discuss application of RFG in GB;
  - Provide an update on RFG progress in Acer (by Ofgem).

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 include 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.
- Stakeholder Engagement during the formal consultation is planned as follows:
  - ENTSO-E workshop, 9 August, Brussels;
  - JESG DCC workshop 21 and 22 August, Warwick.

3. Capacity Allocation and Congestion Management (CACM) Network Code

- The formal consultation closed on 23 May 2012. Over 2000 comments were received from 30 respondents from across Europe.
- The comments received and the areas where the Network Code will be updated, are as follows:
  - Capacity calculation should be coordinated by region;
  - Increased emphasis on Flow Based methodology as a default for capacity calculations, but with a non-time limited exception for Net Transmission Capacity (NTC) method;
  - Clearer reporting on bidding zone definitions and review;
  - The need to define force majeure and emergency situations;
  - Greater clarity on transitional intraday arrangements;
  - More flexibility in algorithm development and amendment;
  - Alignment of timings;
  - Alignment with the Governance Guidelines;

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

  - Harmonisation of definition and improvement of recitals.
- A version of the Network Code was circulated by ENTSO-E on 16 July, illustrating the changes made to date acknowledging that further work was still required.
- User Groups meetings will be held on 7 and 29 August. GB Stakeholders may attend these by discussing their interest with Mark Copley (mark.copley@entsoe.eu).
- The Network Code is due submission to ACER by 30 September.
- JESG will hold a discussion / issues review workshop on the final Network Code on 23 and 24 October.

4. System Operation Framework Guidelines.

The three Network Codes under development under this Framework Guideline (Operational Security, Operational Planning and Scheduling, and Load-Frequency Control and Reserves) were not discussed at this month's JESG

5. Electricity Balancing Framework Guidelines.

- The ACER consultation on the draft Balancing Framework Guidelines closed on 25 June 2012.
- Ofgem provided a presentation on the key points from the ACER Consultation. These are:
  - A total of 47 responses were received including 5 from GB stakeholders.
  - Overall there was support for the objectives and principles in the Framework Guidelines.
  - In light of the responses received, ACER is to revise the drafting of certain areas. These are outlined in the presentation.
- The next steps in the finalisation of the Framework Guidelines include:
  - July/August: Further meetings for the ACER drafting team and final changes to the Framework Guideline text;
  - September: ACER final approval of Framework Guidelines;
  - Late 2012: ENTSO-E to start development of Electricity Balancing Network Code.
- Ofgem are due to publish details of process and interactions of ongoing items within the UK industry being mindful of industry resources (e.g. cash-out, target model, European Network Codes, Electricity Market Reform etc.).

6. Presentation by ENTSO-E

Mark Copley (Consultation Manager, ENTSO-E Secretariat) attended the meeting and provided an update on the Network Code Development process from the ENTSO-E perspective and received feedback from GB stakeholders.

A discussion followed where various ideas for improvements to the ENTSO-E processes, particularly around stakeholder engagement, were discussed. These are detailed in Mark's presentation. The key points raised by GB Stakeholders to ENTSO-E were:

- The 'early draft' versions and calls for comments is appreciated, but sufficient time must be made for their review prior to meetings;
- There is an absence of the detailed 'page turn' exercise at the European level;
- It is not clear how all the Network Codes align, and how they overall fulfil the high-level obligation of a single European market;
- Network Codes are not consistent with each other in terms of content, process and definitions;
- Confusion is caused by the terminology used for different types of meetings which have different audiences. These are also not consistent across the Network Codes;
- There should be a clearer guide as to who is impacted by which Network Code, and ideally which article of which Network Code;
- A simpler, clearer and easier to read website would be appreciated. A single ENTSO-E calendar would also be beneficial.
- JESG expressed a desire for definition of a process for the implementation, management and governance of the Network Codes once accepted through Comitology.

7. Feedback from DECC on Comitology Preparation

For RFG, the JESG is to be used as a forum to distil down the issues in to 2 or 3 key issues, which cam them be used by DECC during Comitology.

The RFG Network Code is the first Network Code expected to enter Comitology in Q4 2012. The RFG Workshop on 2/3 August will be critical in distilling the current issues log (attached) to the small number of key issues for the GB Stakeholder community.

8. 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 public stakeholder workshops are published on the ENTSO-E website (https://www.entsoe.eu/resources/network-codes/) and are recorded in the JESG agenda for this meeting.

It was noted that a consultation on the '2012-2013 ENTSO-E Work Program' is currently underway until 3 September. Interested parties should visit the ENTSO website[3].

9. Next meeting.

The next scheduled meeting for the JESG is 16 August 2012 at Shepherd + Wedderburn, Edinburgh.

The actions log and issues logs follow this report.

3 https://www.entsoe.eu/the-association/entso-e-work-program/

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	Complete: Workshop will cover this action
13	Ofgem to facilitate the advertisement of JESG to target micro generation	Ofgem	Ongoing
20	Chair of JESG to write to ENTSO-E to: • request that meetings are not held on Mondays and Fridays, or very near Christmas as it will discourage attendance. • request that a sufficient length of time is provided for consideration of papers prior to meetings (suggested at least 10 days) Peter Bolitho to provide BV with some words on the ENTSOG process	Barbara Vest Peter Bolitho	Open
32	Raise the following issues with ENTSO-E: • 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	Complete
33	Restructure the JESG Website to highlight documents such as the comparisons between the European Network Codes and existing GB Codes	Paul Wakeley	Complete
34	Attendees at RFG workshops should attend prepared with their list of top 'key issues'	All	Complete: Workshop attendee have been advised
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	Complete
36	Arrange or rearrange JESG workshops, where possible, as follows: • 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	Complete
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	Ongoing
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	Ongoing
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

Action No	Action	Lead Party	Status
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.	Tom Ireland	Complete – please refer to FAQ document
41	Verify the meaning / impact of mandatory vs non-mandatory, and principles in the RFG Network Code	Tom Ireland	Complete – please refer to FAQ document
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	Complete – please refer to supporting documents
44	Circulate details of the JESG to the distribution trade associations list to invite interested parties	David Spillett / NGET	Complete
45	Circulate latest version (16/7) of the CACM Network Code to JESG members.	NGET	New
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	New
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	New
48	Feedback to ENTSO-E regarding the lack of clarity in the draft DCC Code, including: • who the Network Code applies to, and how, • the intent of Article 4(3). National Grid will provide clarity on this (by article) for the DCC workshop in August	NGET	New
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	New
50	Prepare the calendar for 2013 JESG monthly meetings to be held monthly and by default in London.	NGET	New
51	Circulate details of the expected consultation on Forwards Markets	Will Kirk-Wilson	New
52	Chase tracked changes version of the RFG Network Code from ENTSO-E	NGET	New
53	Amend meeting agenda to make clearer what ENTSO-E meetings are being listed (i.e. public stakeholder workshops only)	NGET	New
54	Feedback from Ofgem / DECC Stakeholder Meeting to be included on the next JESG agenda	NGET	New
55	Send a note around JESG members in advance of the August JESG, regarding meeting up the night before	BV	New
56	Circulate the 20 pages of comments on the OP&S Network Code.	GG	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’.

RFG Issues Log (updated 13/07/12)

Completed by: [please state name and company]

Aim:
Distil list of issues on RFG from GB stakeholders to share with DECC for comitology

Background and action required:
To date the JESG has collected a list of issues which currently contains 51 comments, questions or issues. This list has been under development since the early stages of the RFG – as a result, some of these may no longer be a concern for stakeholders.

The issues list below has been split to divide those issues which were previously closed from those issues which remained open. In advance of circulation of this version National Grid has sought to 'tidy up' the issue list, including seeking to identify open issues which might now be categorised as closed. Please note both this and the original view on closed issues requires your attention.

In order to prepare for the RFG workshop on August 2/3, please can you complete and return the following:
• Provide detail of your priority (no more than) 1-2 key comments which you see as critical to share with DECC on the RFG (these may already be captured in the issues log or may be new).
• Should each item on the issues list remain open (yes or no);
• If the issue remains open please rank the priority of the issue (1 = low priority; 2 = medium; 3 = high priority);
[Columns for your completion have been highlighted in green]

Please complete this by 26th July 5pm and return to cusc.team@nationalgrid.com. We ask that all workshop participants complete this in advance of attending the workshop.

National Grid will then update and compile the responses for discussion and use in the workshop. During the workshop participants will be given the opportunity to discuss their key comments as well as review the list.

Any questions please contact Carole Hook (01926 654211) or Tom Ireland (01926 656152).

USEFUL LINKS:
Presentation from Feb 22nd: http://www.nationalgrid.com/NR/rdonlyres/90BC5657-D5CA-414A-B6BA-E20D9038CFA9/51778/RfGQAPresentation.pdf
Link to ENTSOE website: https://www.entsoe.eu/resources/network-codes/requirements-for-generators/ (Including Frequently Asked Questions, FAQs, Motivation and Approach, M&A)

	Description of your priority RFG comments	Impact and evidence	Notes
1			*Please note DECC has indicated that evidence based arguments will be required to support their discussion during comitology. Please provide this. Please provide maximum 2 priority comments.*
2			

1= low priority
2= medium
3 = high

TABLE 1 - PREVIOUSLY CLOSED ITEMS

No.	Issue	Response	Issue Open/Closed	If open, please rank priority (1-3)	Any commentary
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 ENTSOE 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. ENTSOE 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 24th 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 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 generators (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 remains**			

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**			
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**			
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 **Item closed - GB stakeholders invited to respond to ENTSOE**			
RfG Implementation					
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**			
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**			
Justification					
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**			
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**			
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. **Item closed - GB stakeholders invited to respond to ENTSOE**			
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**			
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**			
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. **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). **Item closed**			
Specific Technical Elements					
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 ENTSOE and the 15min limit has been accepted and included into the Network Code. **Item closed**			
27	What happens when there is a common/ shared Point of Connection e.g. Cruachan and Ffestiniog?	Item not discussed at Feb 22 RFG JESG but slides describing NGET's response have been posted on the JESG webpage. Issue has been taken back to ENTSOE and drafting has been amended so that in GB two such units can be treated as separate units. **Item closed**			
28	The proposed rate of change of frequency withstand is 2 Hz/sec for 1.25s	Item not discussed at Feb 22 RFG JESG but slides describing NGET's response have been posted on the JESG webpage. Taken back to ENTSOE and drafting now reflects current GB practice. Time aspect removed. **Item closed**			
29	Who will own the Dynamic System Monitoring (DSM) equipment? (Fault recorders)	Item not discussed at Feb 22 RFG JESG but slides describing NGET's response have been posted on the JESG webpage. No change envisaged for GB. **Item closed**			
New Issues/ Questions					
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 vyries of the group, and should be logged for note only. **Item closed**			
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. **Item closed**			

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. **Item closed**			

TABLE 2 - PREVIOUSLY OPEN ITEMS

No	Issue	Status	Issue Open/Closed	If open, please rank priority (1-3)	Any commentary
Banding/parameter selection					
8	Which parameters/obligations change/will not change/may change in GB?	See item 11. **Propose close**			
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. **Propose close**			
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. **Propose close**			
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 Item Open - Action – NGET to feedback to ENTSOE that it would be useful to allow stakeholders to comment on the FAQ and M&A. **Propose close**			
49	Commentary on justification FG 2.1 regarding justification by CBA	**Propose close - see 35**			
Specific Technical Elements					
22	The parameters for the reactive power range may be too inflexible and should therefore be future proofed	Item not discussed at Feb 22 RFG 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. **Item 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?	Item not discussed at Feb 22 RFG JESG but slides describing NGET's response have been posted on the JESG webpage. **Item 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 Synthetic Inertia is required will be delegated to the national level.	Item not discussed at Feb 22 RFG 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. **Item Open**			
26	What were the assumptions behind the minimum Fault Ride Through (FRT) obligations for sub 132kV network?	Item not discussed at Feb 22 RFG 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. **Item Open**			

30	Auto-reclosure obligations have changed (8-2(a))	Item not discussed at Feb 22 RFG 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. **Propose close**			
31	Fault Ride Through is now applied at the generator connection 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.	Item not discussed at Feb 22 RFG 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. **Item Open**			
32	The code forces a formal EON; ION; FON process for all generation – ie energization notice, 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.	Item not discussed at Feb 22 RFG JESG but Slides describing NGET's response have been posted on the JESG webpage. **Item Open**			
New Issues/ Questions					
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. **Propose close - not an RFG specific issue**			
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. **Propose close**			
40	"new requirements not in existing code e.g 92.91 - available power from PPMs"	Item raised but not discussed			
42	Can we comment on FaQ and M&A documents during consultation?	**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. **Propose close**			
43	Where is the CBA for changes e.g. 16.3.C1 - Changed during drafting to introduce new requirements	Item raised but not discussed **Propose close**			
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			
48	Article 2 definitions e.g. control area derogations do they work across other codes?	Item raised but not discussed			
50	Is it worth undertaking a GB Cost Collection/ collation activity now? To aid any future CBA	No decision made at this time			

51	The ENTSOE 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. Fed back to ENTSOE **Propose close**			

DCC Issues Log

Last updated: 18 July 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 guideleines. 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 etenstive 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.
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	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

	of demand (new, existing and sizes)	August Workshop. Stakeholders should feed their comments to ENTSO-E via the consultation tool.

nationalgrid

CACM Issues Log

Last updated: 18 July 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.
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: • **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.	**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.	

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.'

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?	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?	
3.	How can changes in planned outages be changed, after they have been submitted a ‘year ahead’?	