nationalgrid

Headline Report

Meeting name	Joint European Standing Group (JESG)
Meeting number	12
Date of meeting	7 November 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].

1. Issues Log Review.

The issues logs were updated, as required, as each Network Code was discussed.
The current version of the issue logs for each Network Code are attached to this Headline Report.

2. Grid Connection Framework Guideline.

Requirements for Generators (RfG)

- ACER published their opinion[2] on the RFG Network Code on 13 October 2012.
- The opinion states that the Network Code is broadly in line with the Framework Guidelines; however, ACER highlights room for improvement with four areas of the Network Code before it can be recommended to the Commission. The areas for improvement are:
  - The significance test to identify 'significant grid users';
  - Justification of the significant deviation from existing standard and requirements;;
  - National scrutiny of the Network Codes' requirements to be implemented at the national level (Article 4(3));
  - Recovery of costs incurred by TSOs and DSOs (Article 5).
- ENTSO-E is currently working to update the Network Code in light of ACER's opinion, and plan to engage stakeholders through the Stakeholder User Group, DSO Technical Expert Group and a Public Workshop.
- Article 4(3) concerns in RFG echo a broader issue across all codes in determining who they apply to. ENTSO-E wishes to gain agreement on this. Once the definition of what constitutes a 'significant grid user' is determined this will be used in all cases.

Demand Connection Network Code (DCC)

- The formal consultation on the DCC closed on 13 September. In total 1497 consultation comments were received from 38 organisations.
- ACER has also presented their view on the draft Network Code, and they have three main issues with the DCC as presented for consultation. These issues are:
  - Justification of the requirements;
  - General frequency requirements (Article 7 of the draft Network Code);
  - General Demand Side Response requirements: Active power control and System frequency response (Articles 15, 16 and 17 of the draft Network Code).
- The Network Code is due to be completed by the end of December 2012, after which it will be submitted to ACER. The ENTSO-E drafting team is presently updating the Network Code in light of the Stakeholder comments and ACER's views.

[1] http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/workingstandinggroups/JointEuroSG/
[2] http://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2008-2012.pdf

3. Capacity Allocation and Congestion Management Framework Guidelines

CACM Network Code

- The final CACM Network Code[3] was published on 27 September 2012, and submitted to ACER for review against the framework guidelines. ACER has three months to complete this review (therefore, the opinion is due by 27 December 2012). The ACER opinion is currently being developed and no further information is available at this stage.

Forward Capacity Allocation Network Code

- The Forward Capacity Allocation (FCA) Network Code commenced formal drafting on 1 October 2012, following the receipt of the mandate letter from the European Commission.
- The FCA Network Code will define the high-level principles for the market for interconnector capacity for any trading undertaken before day-ahead, as part of the single European target operating model.
- The target model market structure for the Forwards Markets, is proposed to consist of:
  - Explicit capacity auctions;
  - Financial Transmission Rights (FTRs) or Physical Transmission Rights (PTRs) with 'Use it or Sell it' (UIOSI);
  - A single pan-European platform (although regional transitional platforms will be allowed);
  - Harmonised rulebook, products and nominations.
- The Network Code is closely linked to the CACM Network Code (which deals with the market in day-ahead and Intraday timescales). The FCA will use the same structure, definitions and articles with the CACM code where possible (eg uses the same definitions, functional structure, NRA approval and consultation articles etc.)

4. Electricity Balancing Network Code

- ENTSO-E has started the early drafting of the Electricity Balancing Network Code, and expects to receive the formal mandate to commence drafting in Q4 2012. Once the mandate has been received ENTSO-E will have twelve months to complete the drafting of the Code (including the Stakeholder engagement) and present the Network Code to ACER.
- The Balancing Network Code will be written based on the Framework Guidelines[4] issued by ACER on 18 September 2012.
- The Balancing Network Code, owing to the timescale available to write it and the current differences in balancing mechanisms across Europe, will specify requirements at a high-level.
- The Network Code is to be developed around three key areas:
  - **Procurement and product definition:** product and procurement harmonization, procurement of balancing reserves and, procurement of balancing energy
  - **Capacity reservation and use:** cross border exchange, reserve sharing and co-optimisation methodology to reserve / allocate capacity
  - **Imbalance settlement:** imbalance settlement period, imbalance pricing methodology and volume calculation
- The Network Code has strong links with other Network Codes including LFC&R and CACM.

5. System Operation Framework Guidelines

Operational Security (OS) Network Code

- The public consultation on the OS Network Code closed on 3 November. ENTSO-E has announced that 1220 comments were received from Stakeholders, which are now being considered by the Drafting Team.
- The OS Network Code was not discussed further at this month's JESG.

Operational Planning and Scheduling (OP&S) Network Code

- The Public Consultation on the OP&S Network Code will run from 7 November until 7 January 2013. The Consultation can be found on the ENTSO-E website[5], along with a copy of the latest draft Network Code[6].

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[3] https://www.entsoe.eu/fileadmin/user_upload/_library/consultations/Network_Code_CACM/120927_CACM_Network_Code_FINAL.pdf

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

[5] https://www.entsoe.eu/consultations/document/docdetails.do?uid=0004-977a-4fb0-1267-9a12&

[6] https://www.entsoe.eu/consultations/download.php?id=ffff-706a-116c-3eec-6e69

- The OP&S Network Code was not discussed further at this month's JESG.

Load-Frequency Control and Reserves (LFR&C) Network Code
The LFR&C Network Code was not discussed at this month's JESG.

6. GB Implementation / Application of Network Codes

- Ofgem and NGET updated the JESG on the work that is ongoing to consider the approach required to implementing the European Network Codes (ENCs) in the GB Framework.
- The ENCs are directly applicable (as they will be European legislation) and will supersede existing GB frameworks. However, the requirements will need to be transposed into the GB Framework to ensure that GB requirements, markets and operations are consistent with the ENCs.
- Ofgem has held scoping discussions with some relevant electricity licenses on potential implementation approaches to ensure GB compliance with ENCs.
- The following are the starting assumptions for implementing ENCs in GB:
  - A consistent approach with regard to the principles is required across the gas and electricity regimes;
  - GB stakeholders must be engaged in the process;
  - There will remain (current and new) elements of the GB framework which go beyond those required in the ENCs;
  - Elements of the existing GB framework will remain given that some ENCS will not be retrospectively applied.
- NGET has highlighted a possible process to follow to determine whether GB code changes may be required – see flow chart on JESG website.
- Broader stakeholder engagement will be initiated once the implementation options are better understood. Worked examples from the RFG Network Code are being produced to illustrate and inform the possible options.

7. TSO Certification

- Ofgem provided a brief update on TSO Certification.
- In GB various parties are certified as TSOs – NGET, SHETL, SPTL, OFTOs and Interconnectors. This is a broader definition of TSO than that used elsewhere in Europe.
- The European Network Codes are often written with obligations such as "TSOs shall…"
- It is the opinion of Ofgem's lawyers, that the European Network Codes therefore apply to all those certified as TSOs within GB.

8. 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

9. Next meeting

The next scheduled meeting for the JESG is 6 December 2012 at Elexon, London.

The actions log and issues logs follow this report.

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?

JESG Actions

Last Updated: 8 November 2012

Action No	Action	Lead Party	Status	Update
Ongoing Actions				
5	Determine the priority issues within the issues log	Barbara Vest & All	Ongoing	
42	For each Network Code a comparison document between the Network Code and existing GB Codes will be produced.	NGET	Ongoing	
49	Ofgem to consider if a GB Stakeholders meeting on the Transparency Guidelines is required and what the best process is for arranging such a meeting.	Ofgem	Ongoing	A final draft is due to be available by 12 November. The requirements for GB Stakeholder engagement will be considered further. A cross-border meeting to be attended by DECC will be arranged in December.
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
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	Ongoing	See Attachments (79a) JESG letter, and (79b) ENTSO-E reply. 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.
82	Review DCC Issues Log from a retail perspective	Rosie McGlynn	Ongoing	
88	Provide feedback to the Grid Code, CUSC and BSC Panels on the JESG (using the slides from the September JESG meeting) and seek approval for the updated JESG Terms of Reference.	Chair (GC and BSC) Garth Graham (CUSC) NGET	Ongoing	Material scheduled to be discussed at panel as follows: • BSC Panel – 11 October (approved) • CUSC Panel – 26 October (approved) • GCRP – 21 November (pending) Expect to report final update to JESG in December.

Action No	Action	Lead Party	Status	Update
New Actions captured at November JESG				
91	Add 'summary update of all Network Codes' as an Agenda item at future JESG meetings.	PW	**Open**	
92	Are general Stakeholders permitted to attend the 26 November meeting on FCA?	WKW	**Closed**	No – this is a Stakeholder Advisory Group meeting which has a defined membership. Any stakeholders interested in attending these meetings should contact WKW or ENTSO-E.
93	Write to ENSTO-E to ask how GB Stakeholders should engage with the RFG revision process, in light of the ACER Opinion.	BV	**Closed**	Letter sent by BV 7/11/2012
94	Write to ENTSO-E to raise GB Stakeholders' continued concerns regarding the Governance / Stakeholder Engagement process	BV	**Open**	
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	**Open**	
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.	BV	**Open**	
97	Consider holding August 2013 JESG in Edinburgh to coincide with EnergyUK meetings, and facilitate engagement with Scottish based Stakeholders.	BV/PW	**Open**	

Actions closed at November JESG				
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	Closed	Ofgem are working to define a process and presented to the November JESG.
69	Provide an update on GB TSO Certification and the interaction with European Codes	Ofgem	Closed	Ofgem are considering this and are and presented to the November JESG.

Action No	Action	Lead Party	Status	Update
80	Where are the SQSS-type requirements being captured in the European Network Code Project? In particular what is the driver for the frequency quality issues stated in the LFR&C.	NGET	Closed	As the technical aspects of the different TSOs and synchronous areas differ in range it is intended that the SQSS will be a matter agreed between individual TSOs and NRAs. It has been suggested that the different requirements and system indicators for the areas should be published together.
81	Schedule a two-day technical workshop for the LFR&C Network Code during the public consultation	NGET	Closed	Workshop scheduled for 7 & 8 March 2013
83	Which NRA is taking the lead within ACER for the ACER review of the CACM Network Code?	Ofgem	Closed	ACER will have overall led of the project with inidivudal regulators leading on specific areas of the Network Code: • Ofgem – Intraday • Bundesnetzagentur (Germany) – Day Ahead • Commission pour la Régulation de l'Electricité et du Gaz (Belgium) - Intraday
84	Provide feedback on if a view can currently be given as to who might be required to provide what information under the CACM requirements.	NGET	Closed	The current understanding is that generators will likely need to provide data similar to the OCs and BCs of the Grid Code, at D-2 as well as D-1. This data will be provided on a reasonable endeavours basis. The detail and timeframes for the precise data requirements are not included in the CACM Network Code, and will be determined following the process outlined in the Network Code.
85	Discuss with DECC/Ofgem how the 23/24 October dates can be used for the DECC/Ofgem led Stakeholder review of the CACM Network Code.	NGET/ Ofgem	Closed	Ofgem / DECC Stakeholder group held on 23 October for CACM Network Code
86	Send link to Mike Kay on the “Role of JESG letter”	NGET	Closed	Complete (18/9)
87	Provide comments on the revised Terms of Reference for the JESG to the Technical Secretary by 1 October Terms of Reference to be updated with comments from Garth Graham and Barbara Vest	All NGET	Closed	(see Action 88)
89	Find and update colour coded diagram of Network Code status as referred to by Garth Graham	PW	Closed	Published to website
90	An update on the outcome of the ACER opinion on RFG to be circulated in advance of the next meeting.	Ofgem	Closed	Update circulated to JESG members. Ofgem to provide further update at November JESG Meeting.

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DCC Issues Log

Last updated: 8 November 2012

Issues 11 to 29 were captured at the DCC Workshop on 21/22 August 2012.

Issue No	Issue	NGET View
1.	What will be the contractual relationships between domestic User and DSO? There may be no direct monetary benefit for the consumer from providing demand side response – it's an overall societal benefit. Will there be an aggregator on behalf of the consumers to link with suppliers?	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 European and National levels once the Network Codes are implemented.
2.	Will the smaller scale Frequency Response (DSR SFC) 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 Network Code issued for consultation requires this capability to be mandatory, which is available for frequency management with a deadband and/or without deadband. The appliances which will have the capability installed are to be determined through a cost benefit analysis.
3.	There is a concern that very complicated and interdependent solutions are being rushed through.	DSR has been in place for over ten years. Any learning points from such examples have been identified and considered in the development of the Network Code. The starting points is that no appliance type will have DSR installed, giving further time to consider reaching T and D details.
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 attempts to solve 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. Having DSR capability can be "called upon" to provide short time operating reserve for system frequency response
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 generation profile and demand needs to be more flexible. These aspects are changing dramatically, see justification document.
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.
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 Network Code is not clear in places. There will be an opportunity to discuss the Network 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. The viability of existing commercial services is out of scope for the Network Code, but the practical experience of the DSR technology is noted.

Issue No	Issue	NGET View
11.	**Applicability** As presently drafted it is not clear which types of 'Demand Facilities' or 'Distribution Networks' individual articles of the Network Code apply to.	Acknowledged. Drafting can be improved to make applicability clearer.
12.	**Significance** The concept of a Significant Demand Facility and Significant Distribution Network is not well defined, meaning there is ambiguity in who the Network Code is applicable to.	Acknowledged. Drafting can be improved to make definition of significant clearer, however, there will still be an element on national choice.
13.	**Definitions** There are various issues with individual definitions and consistency of definitions with other Network Codes.	Acknowledged. Drafting can be improved to make definitions tighter. Please make comments on specific definitions of concern.
14.	**Impact on Domestic Consumers** Domestic appliances with DSR APC (for example Washing Machines) will be captured as a Demand Facility with DSR under this Network Code. Many requirements placed on domestic appliances seem to be disproportionate or difficult to enforce Examples include: modernisation, development, replacement [Article 13], notifications [Title 3], compliance [Title 4], disconnection and reconnection [Article 14(6)], and actions under force majeure (Article 16(1)(m)) etc.	Acknowledged. Further work is needed to ensure requirements on domestic DSR are proportionate, and clarify that these either do not apply at all or only in very limited circumstances.
15.	**Article 3(5)** If a facility is not covered by the Network Code then existing arrangement shall continue to apply. However, it is not clear how these existing arrangements could be amended, given the current wording of Article 3(5).	Noted. The legal drafting at national level need to take on this challenge, as existing requirements only exist at national level.
16.	**Language** There are various aspects of language used in the document that need to be improved to aid clarity: • Actions need to be placed on the correct party – i.e. only owners / operators can notify, whereas a network or facility can comply. • Where an 'agreement' is required, it needs to be clearer which parties are agreeing. • There are some double verbs which can cause confusion e.g. 'to facilitate to require'.	Acknowledged. Remember the document is drafted by many people for whom English is a second language. However, happy to accept comments on specific areas of improvement.
17.	**Privacy Concerns** Aspects of Information Exchange may need to be amended to address privacy concerns, particularly relating to the type of information for individual citizen's DSR equipped appliances.	This is partly addressed by Article 5: Confidentiality Obligations; however, further provisions could be included to allay citizen's potential concerns.
18.	**Consultations and approvals** Various processes and agreements in the Network Code are not explicitly subject to the requirements of 4(3). There should be a general condition that information should be published, consultations held and decisions made by the NRA, unless explicitly stated. There also needs to be a process to broker deadlocks in the such approval process, and allow the appropriate right of appeal.	Noted.
19.	**Demand reporting** There is a lack of clarity in the drafting in relation to the term "amount of demand disconnected at each setting" [14(1)(e)]. It needs to be clarified. Is the amount based on a forecast, the peak or the capacity.	Noted. Please suggest which mechanism would be preferred.

Issue No	Issue	NGET View
20.	**Use of the DSR Service** There are potentially at least three parties who may wish to use an individual's DSR service to shape overall demand - Supplier, DSO and TSO. The consumer only has a relationship with the Supplier. How is this expected to work in the future?	The DCC only provides capability and does not define the Market under which DSR service will operate. The drafting team expect the Supplier to continue to interact with the consumer. If the DSO or TSO requires the services, it can be potentially contracted through the Supplier, although this may not be the only way in all countries, e.g. aggregators are already active for Balancing Services.
21.	**System Frequency Control - Devices** As drafted the Network Code only applies to "Temperature Controlled devices identified as significant". Is this intentional as further devices, such as water pumps, can also be able to provide SFC response.	Temperature Controlled devices are considered more appropriate for DSR APC services, as they lend themselves to proportional control. Other devices may not support proportional control.
22.	**Article 16** Article 16 contains various requirements for DSR APC, RPC and TCM. The applicability of each service is not clear. The article should be split for clarity.	Agreed.
23.	**DSR Reactive Power Control** There is a discrepancy over who can provide Reactive Power Control. Is it only Transmission Connected Facilities or it is Transmission and Distribution Connected Facilities?	Noted the drafting team will address.
24.	**Force Majeure – Article 16(1)(m)** The concept of force majeure is used but not defined. A definition is provided in the CACM.	Further consideration is being given to this issue within ENTSO-E.
25.	**System Frequency Control – deadband** What is the expected frequency deadband for temperature controlled devices in GB?	The deadband need not be specified until after the Network Code has been implemented nationally and each synchronous zone will define their respective parameters. Present analysis suggests it is most likely to be zero deadband for a GB application, although same appliances may be selected for LFDD replacement and therefore have a deadband.
26.	**System Frequency Control – language** There is ambiguity in the drafting over achieved temperature, target temperature, set point temperature and temperature ranges.	Agreed. Please feedback specific comments through the consultation.
27.	**Article 18 – DSR Very Fast APC** Article 16 does not make it clear that if you voluntarily provide a service under article 16, you may be required to provide an additional service under Article 18.	Agreed. A reference in Article 16 could be provided.
28.	**Derogation** The process needs to be reviewed to ensure there is appropriate information sharing between all the parties involved, and to ensure that CBAs are being undertaken by a party independent of the party applying for the derogation.	Noted. Please feedback specific comments through the consultation.
29.	**Timescales** There are various timescales in the Network Code, particularly around applying to be considered as 'existing plant', operational notifications and process for derogations. It is not clear that these timescales are all consistent.	Noted. Please feedback specific comments through the consultation.

Forward Capacity Allocation

Last updated: 8 November 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: 8 November 2012

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

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: 8 November 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.

Load-Frequency Control and Reserves Issues Log

Last updated: 8 November 2012

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 using DC links. The products and market structure 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 is not expected to contain any methodology for determining credible loss; it will be a TSO decision and subject to NRA approval.
3.	The Code, as currently drafted, uses the term 'Significant Grid User' – without any definitions, or mechanism to determine it.	The Code is intended to be drafted without reference to 'Significant Grid User', but instead place a threshold for parties that need to be covered by the Code – within GB this is expected to be 3MW or greater.