

Grid Code Workgroup Consultation Response Proforma

GC0106 Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL)

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5pm on 27 April 2018** to grid.code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Chrissie Brown at Christine.brown1@nationalgrid.com

Respondent:	Susan Mwape susan.mwape@nationalgrid.com
Company Name:	National Grid
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity ii. To facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity) iii. Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole iv. To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and v. To promote efficiency in the implementation and administration of the Grid Code arrangements. <p><i>The Distribution Code objectives are:</i></p> <ul style="list-style-type: none"> i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity. ii. Facilitate competition in the generation and supply of electricity.

	<p>iii. Efficiently discharge the obligations imposed upon DNOs by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0106 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	The original proposal positively facilitates efficiency in discharging the obligations imposed upon the licensee and all relevant legally binding decisions of the European commission and the Agency. The proposal aligns with guidance from BEIS and Ofgem to apply the new EU requirements within the existing GB regulatory frameworks and to use the existing governance processes. Following this approach provides accessibility and familiarity to all GB parties as well as promoting efficiency in the implementation and administration of the Grid Code arrangements. The key aim of the regulation on data exchange is to allow for TSOs to exchange data with neighbouring TSOs in a harmonised approach. In the case of GB synchronous area the observability area does not currently stretch into neighbouring countries therefore there is benefit in maintaining the existing GB data exchange between TSOs, DSOs and SGUs as that data is currently sufficient for state estimation. GB common grid models are already submitted to the EU platforms using existing data as required by regulation on capacity allocation and congestion management. Future changes are necessary hence there is merit in raising future Grid Code changes through other work streams that are going on to support the change in roles for the distribution and transmission system operator functions.
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	<i>If yes, please complete a WG Consultation Alternative Request form, available on National Grid's website,</i> https://www.nationalgrid.com/uk/electricity/codes/grid-

		code and return to the Grid Code inbox at grid.code@nationalgrid.com
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Specific GC0106 questions

Q	Question	Response
5	For those respondents that the Workgroup believes are directly affected by the GC0106 proposal (i.e. (i) new Type A power generating modules of less than 16A per phase, (ii) DNOs and (iii) CDSOs) do you agree with the proposed revised data exchange requirements? Do you have any comments on the drafting of the associated legal text set out in Annexes 4, 6 and 7?	
6	Do you believe that the solution described in this Workgroup Report discharges the legal obligations of the SOGL and other relevant EU legislation?	<p>Yes. In line with Ofgem advice, the original proposal seeks to make only those changes necessary to the Grid code and Distribution Code to ensure compliance with SOGL and KORRR. Article 40.5 SOGL allows for TSO discretion on the application of some of the Articles through determining the applicability and scope for some of the structural, scheduling and real time data. This proposal therefore has a focus on making changes only in relation to the mandatory Articles with no TSO discretion.</p> <p>The solution builds upon the existing market structure arrangements that apply to large, medium and small providers. National Grid and DNOs currently have sufficient data to operate the transmission and distribution systems respectively in an efficiently and coordinated manner. In order to meet SOGL compliance it is sufficient to maintain the status quo. In GB the Grid and Distribution Codes are aligned to allow for the necessary data exchange between them and for SGUs connected to the respective networks. The proposed changes will ensure compliance of mandatory changes and where flexibility is adopted future changes will be raised in accordance with changes to the system operation roles for both distribution and transmission.</p> <p>Setting stringent data exchange requirements may stifle innovation in growing markets particularly for demand side providers. Implementing non-mandatory changes may lead to financial investments with little benefit to the TSO. This may put compliance at risk as the deadline is 14 March 2019.</p>

7	For those parties that the Workgroup believes are not directly affected by the GC0106 proposed revised data exchange requirements, do you have any comments on the approach and/or legal drafting?	
8	Do you have any views on the legal interpretation aspects set out in Section 9 together with the explanatory information in Annexes 2 and 3?	The wording in articles 44, 47 – 53 in SOGL , “unless otherwise provided by the TSO,...” provides some flexibility in agreement of the applicability and scope of data exchange. The key aim is to exchange data with other TSO in the case of GB, currently there is no requirement to exchange data with a neighbouring TSO so we support the legal interpretation which was echoed in a letter from the European Commission to EU DSOs. This approach and aligns with the Regulator’s guidance on implementing EU code changes.
	Legal text comments	The legal text for PC.A.3.1.4 will be amended such that it does not refer to each embedded power station as suggested below: (iii) beginning from the 2019 Week 24 data submission, for Embedded Small Power Stations with Registered Capacity of 1MW or less, their best estimate of the aggregated capacity of all such Embedded Small Power Stations per production type as defined the list in PC.A.3.1.4 (a)(ii)(2)(a).
	<i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided here. These will then be discussed at the GC0106 Workgroup meetings planned following the closure of this Consultation.</i>	