

Grid Code Workgroup Consultation Response Proforma

GC0130 – OC2 Change for simplifying ‘output useable’ data submission and utilising REMIT data

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 23 December 2019** 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.

Respondent:	Lorcán Murray lorcan.murray@britned.com
Company Name:	BritNed Development Limited
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	

Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0130 Original proposal, the proposed alternative in Annex xx or any potential alternative that you may wish to suggest better facilitates the Grid Code Objectives?	BritNed believes the proposal (Proposer's Solution) in the consultation better facilitates the Grid Code Objectives
2	Do you support the proposed implementation approach?	We welcome the timetable and the implementation approach although a more detailed timetable for the new TOGA platform would be required
3	Do you have any other comments?	<p>It was not initially clear how this consultation would impact interconnectors. Interconnectors do submit data to TOGA, not just Generators, and Interconnectors such as BritNed are also subject to REMIT reporting obligations, contrary to what is stated in section 4 of the consultation document.</p> <p>Ellexon is not the only reporting platform for REMIT</p>

		<p>and BritNed does not use Elexon to fulfil its REMIT obligations. Other Market Participants may have similar reporting policies as ourselves.</p> <p>Therefore, we are pleased with the current proposal as it allows for flexibility of Market Participants and would allow for BritNed to continue to submit its OC2 data via TOGA without great disruption.</p> <p>We think that the legal text provided alongside the consultation could be made clearer: · At no point does the legal text propose any guidance about the interaction between REMIT and TOGA declarations. With more than one system and so method to discharge the Grid Code obligations, we feel that the Grid Code should set out how parties can discharge their OC2 obligations either using TOGA or using REMIT, perhaps included as an appendix to OC2.</p> <p>· The proposed legal text changes to OC2.4.1.2 states that applies to “Generators, defined by OC2.3.1 including (a) (b) and (e)”. OC2.3.1 (b) and (e) imply that all references to “Generator” apply to Interconnector Owners and Network Operators. This could cause confusion and so we would strongly advise that the text is redrafted so make it explicitly clear which obligations apply to Generators, which to Interconnector Owners and which to Network Operators.</p> <p>· After OC2.4.1.2. (d) the text places an obligation on parties to report for each individual shaft if a multi shaft generating unit or each individual pole if a multi-pole interconnector. While the obligation is clear, we believe that the means of discharging that obligation is not and that some further clarity should be given in the text on how REMIT declarations can be used to discharge the obligation.</p> <p>· There are a number of typographical and grammatical errors in the legal text</p>
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

Specific GC0130 questions

Q	Question	Response
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5	Which system do you think you would use for your data submission, i.e. TOGA, Remit or both if given the choice?	Our OC2 data would likely be submitted via TOGA, therefore we welcome a two-platform approach. However, we agree that double reporting is undesirable for all parties so we welcome the solution that offers choice.
6	<p>We will define in the Grid Code that each generator shall provide The Company with any changes to the available Output Usable from now until 3 years ahead. We propose for an unplanned Event, the Generator shall provide the data within 1 hour of the event occurring, and for a planned Event, the Generator shall provide the data within 1 hour of the planning of the Event. This in REMIT is within 5 minutes, so:</p> <p>For non-REMIT submissions (direct to TOGA), on a known change of output, within what timeframe do you think these changes should be notified to National Grid ESO (where 1 hour is the example above)?</p>	<p>REMIT data must be reported within 1 hour. We question the wording here that states “this in REMIT is within 5 minutes”. We are not aware of any 5 minute requirement.</p> <p>We would question the need this change to 5 minutes and why the data would be required to be submitted so immediately?</p>
7	Does the use of the REMIT description field for multi-shaft data cause any existing Users any problems?	No comment
8	Can you confirm that you are happy for the removal of margin zonal data, if you are not, please explain the issue?	Yes
9	Can you indicate the amount of time you would require to prepare for the change in how data is submitted to NGESO where applicable.	This would be dependent upon the design of the new version of TOGA. Additional training may be required as well as a change to our reporting systems. Such changes should be considered when an implementation timeframe is developed.