

Grid Code Administrator Consultation Response Proforma

GC0130: OC2 Change for simplifying 'output useable' data submission and utilising REMIT data.

Industry parties are invited to respond to this Code Administrator 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 **17:00** on **13 May 2020** to grid.code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be addressed to Nisar Ahmed at Nisar.Ahmed@nationalgrideso.com

These responses will be included within the Draft Grid Code Modification Self Governance Report to the Grid Code Panel and within the Final Grid Code Modification Self Governance Report to the Authority.

Respondent:	<i>Will Jones</i>
Company Name:	<i>National Grid ESO</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity(b) Facilitating effective 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);(c) 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;(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally

	<p>binding decisions of the European Commission and/or the Agency; and</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p>
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Code Administrator Consultation questions

Q	Question	Response
1	Do you believe GC0130 better facilitates the Applicable Grid Code Objectives? Please include your reasoning.	<p>Yes.</p> <p>We believe the proposal better facilitates all of the Grid Code Objectives:</p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <ul style="list-style-type: none"> • Positive. The proposed changes are more efficient as they reduce duplication for Generators and Interconnectors when submitting data under OC2 by enabling them to fulfil the requirements of both via a single submission to the REMIT system. They also have the option to submit their OC2 data to the new NGESO system if they prefer. Plus: they won't need to submit data as frequently; out-of-date / unused data requirements are removed; and data will be provided to industry more frequently and accurately. <p><i>(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);</i></p> <ul style="list-style-type: none"> • Positive. The proposal will result in better OC2 data quality, reduced inconsistencies and increased frequency of reports published back to the market. This will facilitate effective competition and better market situation awareness in the generation and supply of electricity. <p><i>(iii) subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation,</i></p>

Q	Question	Response
		<p><i>transmission and distribution systems in the national electricity transmission system operator area taken as a whole;</i></p> <ul style="list-style-type: none"> • Positive. The benefits to competition and better market situation awareness in (ii) will promote the security and efficiency of the electricity generation, transmission and distribution systems in the National Electricity Transmission System. <p><i>(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</i></p> <ul style="list-style-type: none"> • Positive. The modification improves efficiency by removing the need for many Generators and Interconnectors to provide duplicate data submissions to TOGA and REMIT, and enabling them to meet the obligations of OC2 and REMIT with one single submission. <p><i>(v) To promote efficiency in the implementation and administration of the Grid Code arrangements.</i></p> <p>Positive. The proposal also includes some non-material changes required in OC2 as a result of historical documentation errors relating to Generator Output Usable, which will improve the accuracy of Grid Code.</p>

Q	Question	Response
2	<p>Do you support the proposed implementation approach?</p>	<p>Yes. The consultation document states that:</p> <p><i>‘The Proposer confirmed that they were aiming for an implementation date between 05 November 2020 and 05 February 2021. A suitable date within this window will be decided jointly between NGESO and ELEXON to align with the standard BSC release’.</i></p> <p>The latest view from the BMRA, CGI, is that February 2021 is the earliest achievable implementation date for the changes to the BMRS. The NGESO IS team are still targeting that the GC0130 solution be delivered in November. We’ll continue to work with Elexon to align these code releases with the IS solutions required and to agree the final timeline.</p>

3	<p>Do you have any other comments in relation to GC0130?</p>	<p>Potential delivery risk</p> <p>We would like to note that there is a potential risk to the IT delivery of this due to the impact of COVID-19, which is impacting some projects and departments and may continue to do so.</p> <p>Consequential BSC modification</p> <p>We are raising a BSC modification which seeks to modify the BSC to reflect the GC0130 Grid Code changes: removing the obligations on NGESO in the BSC to publish data that is no longer mandated to be published by the Grid Code; adding obligations to publish the new data; and simplifying the obligations around the existing data.</p> <p>GC0130 is a self-governance mod, and we are recommending that the BSC modification also takes the self-governance route. Assuming this is the case, the aim will be for both modifications to go to the two respective panels for approval concurrently. It is important that both modifications are approved as they aim to achieve the same goal, and the changes to the two codes are inter-dependent.</p> <p>If GC0130 is approved, but the BSC modification is not:</p> <ul style="list-style-type: none"> • NGESO would be unable to provide the data to the BMRA that is required under the BSC. • For example, to continue meeting the unchanged BSC requirements, NGESO would be required to publish 5 years of availability data to BMRS. However, since GC0130 changes the OC2 requirement from 5 years to 3 years, NGESO would be unable to provide the required 5 years of data to the BMRA, and would have no rights to obtain it under the updated OC2, which would now require Generators/Interconnectors to provide only 3 years. This would also apply to the removal of zonal data which the current BSC still requires that we publish. <p>If the BSC modification is approved, but GC0130 is not:</p>
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Q	Question	Response
		<ul style="list-style-type: none"> • The duplication that GC0130 aims to remove would remain. For example, Generators/Interconnectors covered by the REMIT requirements would be required to submit 3 years of availability data to the BMRA, but would still be required to submit 5 years' data to NGESO in line with the unchanged OC2, as this could not be picked up from REMIT. • NGESO would also be in breach of the current Grid Code as they would not have the platform to publish data beyond 3 years, or zonal data.