

## 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](mailto: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](mailto: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.

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

	<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>
--	---

### Code Administrator Consultation questions

Q	Question	Response
1	<b>Do you believe GC0130 better facilitates the Applicable Grid Code Objectives? Please include your reasoning.</b>	BritNed agrees that the GC0130 better facilitates the Applicable Grid Code Objectives. We welcome the efforts made to reduce duplication and that the reporting is to be done for outage reporting.

2	<p><b>Do you support the proposed implementation approach?</b></p>	<p>In general, we support the approach. We welcome the creation of New TOGA for those that do not use Elexon for their REMIT data. This should cover all affected parties and ensure no gaps.</p> <p>The allowance of a wider range of submission through FTP, API or using a Graphical User Interface (GUI) is also welcome.</p> <p>However, we do not agree with the necessity to publish to New TOGA within 1 hour. Market Parties that do not use Elexon but another REMIT platform, are obliged to publish transparency data within one hour. The requirement to simultaneously publish to another platform within the same timescale risks adding undue stress to the process. During an unplanned outage, Market Participants are already under stress.</p> <p>A longer timeframe to within 24 hours for reporting to New TOGA would be welcomed.</p> <p>We consider a better approach in the legal drafting would be to:</p> <ul style="list-style-type: none"> <li>• Make it clear that there are two obligations/ processes – REMIT and OC2 reporting procedures which require data in different time frames</li> <li>• If the REMIT process satisfies the OC2 reporting process (which is probably true for most market participants) make it clear that they do not need to also carry out the OC2 process within the legal text. Also it needs to be clear in the legal text that where this is the case the NGESO has the obligation to scrape this data from the Elexon portal and that the market participant has no further obligation.</li> </ul> <p>The current drafting is also unfair to Users such as interconnector owners or multi-shaft CCGT owners who have to provide more information to the OC2 process. Either the User will have to gather more information under its REMIT systems putting it at increased likelihood of failing to meet its REMIT timing obligations, or it will need to make two declarations to REMIT and OC2 each within one hour. We do not believe that the OC2</p>
---	--	---

Q	Question	Response
		<p>process needs the information within 1 hour, so we would propose the following for the categories of User for whom additional information for the OC2 process is required.</p>
3	<p><b>Do you have any other comments in relation to GC0130?</b></p>	<p>The solution only scrapes REMIT data from the Elexon portal whereas other REMIT portals are available such as ENTSOe Transparency platform. We appreciate you are not specifically referring to the Elexon portal, and therefore futureproofing this, but we are concerned that the solution that is currently offered is discriminating against those who choose to discharge their REMIT obligations in other ways.</p> <p>A final comment is the questions of referring to the EU Transparency Regulations. With the UK Withdrawal from the European Union reference to European Law in GB Codes may struggle to have legal standing. We recommend the Code Administrators to reassess this point in the Legal text.</p>