Workgroup Consultation Response Proforma

**GC0139: Enhance Planning-Data Exchange to Facilitate Whole System Planning**

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 to [grid.code@nationalenergyso.com](mailto:grid.code@nationalenergyso.com)  by **5pm** on **21 January 2025**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact [grid.code@nationalenergyso.com](mailto:grid.code@nationalenergyso.com)

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| **Respondent details** | **Please enter your details** | |
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| **Which best describes your organisation?** | Consumer body  Demand  Distribution Network Operator  Generator  Industry body  Interconnector | Storage  Supplier  System Operator  Transmission Owner  Virtual Lead Party  Other |

**I wish my response to be:**

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| (Please mark the relevant box) | non-confidential *(this will be shared with industry and the Panel for further consideration)* |
|  | **Confidential** (this *will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)* |

**For reference the Applicable Grid Code Objectives are:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *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);*
3. *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;*
4. *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*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**For reference, (for consultation questions 5 & 6) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:**

1. *fostering effective competition, non-discrimination and transparency in balancing markets;*
2. *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
3. *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
4. *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
5. *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
6. *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
7. *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

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| **What is the EBR?** |
| The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.  The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe’s security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem. |

**Please express your views in the right-hand side of the table below, including your rationale.**

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| **Standard Workgroup Consultation questions** | | | |
| 1 | Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives? | Mark the Objectives which you believe the Original Solution better facilitates: | |
| Original | A B C D E |
| Objective E relates to efficiency and administration of Grid Code implementation, and while we support the overall objective, the proposal does increase the compliance cost to the Grid Code for all parties. | |
| 2 | Do you support the proposed implementation approach? | Yes  No | |
| We support the proposed implementation approach at a high-level as it is enhancing the data exchange process and requirements for better understanding of the demand, distributed energy resources and forecasts to allow coordinated and efficient planning as the industry transitions to a smart energy system and distribution system for its operation activities.  However, there are a number of major issues that need to be addressed and confirmed before we believe this proposal should be submitted for authority approval. These are:   1. The effective implementation date and timeframe are uncertain e.g. we interpret the proposal’s January 2026 formal implementation as NESO/DNOs using the Week 28 2026 submission as their first implementation of the new requirements – but this needs to be confirmed. 2. Practicality of the transition to a CIM model for data exchange. The draft does not sufficiently specify the standard or CIM profiles (EQ etc.) required, to assess the level of consistency with the implementation of the CIM LTDS standard. 3. There are ongoing technical limitations with the CIM model that require further development ahead of implementation. This includes standardisation of NESO’s node names, circuits, and transformers. 4. Interaction with other changes and consultations that are directly impacting the Grid Code such as Strategic Connections Group-Battery Storage.   There are also numerous detailed clarity and consistency issues with the drafting of the change, and lack of updated guidance notes to explain the transition to the new requirements, which we share in separate files that accompany this response. | |
| 3 | Do you have any other comments? | It is challenging to link the GC0139 CIM model provision to the ongoing LTDS CIM model development. The LTDS CIM model is in the development stage and undergoing technical challenges where the industry is working to comply with the Distribution SLC25 requirements. Certainly, there are lessons learned that could support and facilitate the implementation of CIM model for GC0139, however, there remain significant discrepancies in the requirements between GC0139 and LTDS that must be considered:   1. LTDS timeline and proposed Week 2, Week 28 timelines are not aligned to permit the CIM data exchange models without incurring additional costs/budget and additional resources. The proposed network model freeze dates for Week 2 and Week 28 are different than that used for LTDS which will incur additional cost and resources. We believe that rather than using exact dates for freezes to take place, the wording should be “by 31st October” and “by 31st March” for Week 2 and Week 28 freeze models respectively. 2. The CIM profile requirements may be different than LTDS (i.e. November LTDS CIM is the Equipment profile only – EQ) but the required profiles for GC0139 are not specified and this discrepancy needs to be resolved. 3. Standardisation of node, circuit and transformer naming. NESO uses specific naming that is only applicable for Week 28 and Week 2 network modelling and does not align with LTDS. This is a substantial parameter that needs to be addressed in the CIM model and tested to ensure that the requirement is achievable before passing proposed modifications for approval. The desired goal should be to have standardised naming conventions across models wherever possible.   There will be additional work needed by the DNOs to be able to meet the Week 2 requirements which will incur additional cost and resources. This work will involve:   1. Additional demand data cleansing and review in the autumn to identify the demand at GB min 2. Running network models at min scenarios and ensuring load flow convergence generating new CIM outputs and DRC schedules | |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | Yes (the request form can be found in the [Workgroup Consultation](https://www.neso.energy/industry-information/codes/gc/modifications/gc0139-enhanced-planning-data-exchange-facilitate-whole-system-planning) Section)  No | |
| No, we do not intend to raise a workgroup consultation alternative request for consideration by the working group because the data exchange options explored are comprehensive, and we concur with the proposed option 4. The proposed option 4 is the most effective and pragmatic solution available. It addresses all the key concerns in the existing Grid Code Planning Code and aligns well with the overall objectives. However, we believe that the working group must present compelling evidence demonstrating the feasibility of option 4, while addressing the identified uncertainties, before proceeding with its implementation. | |
| 5 | Does the draft legal text satisfy the intent of the modification? | Yes  No | |
| The legal draft requires thorough revision, ensuring that all queries and feedback are carefully addressed. This is necessary to provide DNOs with the required information and comprehensive guidance for implementing the proposed modifications.  It needs to offer clear instructions and reflect the new schedules added, revised schedule numbers and additional data requested.  The Schedule numbers mentioned in the legal text and GC0139 Workgroup Consultation\_3 document are not aligned with schedules in Annex 7.  Worked examples or templates to help DNOs understand and execute the changes effectively would minimise any disruptions or ambiguities in the process e.g. of the PSM scenario and PSM change files. By doing so, the revised legal draft will serve as a robust resource for facilitating a smooth transition and successful adaptation of the new obligations. | |
| 6 | Do you agree with the Workgroup’s assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | Yes  No | |

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| **Specific Workgroup Consultation questions** | | |
| 7 | Do you agree that Option 4 represents to the best solution to providing an enhanced data exchange without a significant increase in the number of forecasting schedules exchanged? | The structure of Option 4 represents the best solution to provide an enhanced data exchange. We agree with NESO that there is a limited increase in the number of forecasting schedules. However, we note that there are still significant changes in the data requirements in the schedules and definitions and this will result in additional resourcing requirements. Therefore, we disagree with the inference of there being limited or no additional work for DNOs. |
| 8 | Adoption of the GSR029 definitions and reporting against these definitions ahead of approval of the GSR029 proposals represents a risk that PC annual exchanges will not be aligned with existing SQSS requirements. Do you agree that the risk is minimal and can be managed with ah-hoc data exchanges? | The justification in the GC0139 Workgroup Consultation\_3 document is insufficient for us to form an opinion. It would be helpful to provide evidence that risk assessments have been conducted. Additionally, a clear explanation of why the risk is considered minimal will assist in evaluating your assessment more effectively. |
| 9 | This modification proposal relates to annual planning data exchanges only. The provision of data to support a new connection (PC.4) will remain unchanged and not directly supported with CIM models. This is because the data requirements within PC.4 are not covered by CGMES v3 and would require significant extensions not justified by the benefits. Do you agree with this position of the Workgroup? | Yes, we agree. |
| 10 | Is the delivery timescale of January 2026 to transition to a CIM data exchange methodology reasonable and practically achievable? | No, the proposed delivery timescale of January 2026 to transition to a CIM data exchange methodology is not reasonable and not practically achievable.  There is an urgent need to develop a CIM data exchange process, especially for GC0139 requirements, to ensure that DNOs and NESO can operate them correctly from go live of the change.  The delivery timescale is dependent on the working group closing out the issues that we (and other parties) raise as part of this consultation. These issues are too material to allow DNOs to commence preparation work for CIM model and Schedules at this stage, however when the working group has completed and the change is submitted to the authority for approval we can commence preparation – we estimate that a minimum of six months is needed from authority approval before implementation. |
| 11 | Do you envisage that any costs would be incurred to implement these proposals over and above any changes associated with implementing other CIM data exchanges and those associated with the existing data exchanges | Yes.   1. There is additional work that will be needed by the DNOs to meet Week 2 requirements which will incur additional cost and resources: This work will involve: 2. Additional demand data cleansing and review in the autumn to identify the demand at GB min 3. Running network models at min scenarios and ensuring load flow convergence 4. Generating new CIM outputs and DRC schedules. 5. Updating existing scripts used for Week 28 to accommodate changes and additional requirements for existing schedules such as demand definition changes. |