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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 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

Respondent details	Please enter your details	
Respondent name:	Ryan Westland	
Company name:	SSEN	
Email address:	Ryan.Westland@sse.com	
Phone number:	07769 641740	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector	<input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other

I wish my response to be:

(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*)

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For reference the Applicable Grid Code Objectives are:

- 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 binding decisions of the European Commission and/or the Agency; and*
- e) *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:

- a. *fostering effective competition, non-discrimination and transparency in balancing markets;*
- b. *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
- c. *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
- d. *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;*
- e. *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;*
- f. *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;*
- g. *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.

Standard Workgroup Consultation questions

1	Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives?	<p>Mark the Objectives which you believe the Original Solution better facilitates:</p> <table border="1"> <tr> <td data-bbox="571 1115 810 1173">Original</td><td data-bbox="818 1115 1406 1173"> <input checked="" type="checkbox"/>A <input checked="" type="checkbox"/>B <input checked="" type="checkbox"/>C <input checked="" type="checkbox"/>D <input type="checkbox"/>E </td></tr> </table> <p>Click or tap here to enter text.</p>	Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E
Original	<input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/> C <input checked="" type="checkbox"/> D <input type="checkbox"/> E			
2	Do you support the proposed implementation approach?	<p><input checked="" type="checkbox"/>Yes</p> <p><input type="checkbox"/>No</p> <p>SSEN broadly support the proposals however clarification is needed on various points as discussed in our response to question 3.</p>		
3	Do you have any other comments?	<p>Comment 1:</p> <p>Considering recent data requests from both NESO & TO's for longer term projections, is the proposed change from an 8-year projection to 10 years in Schedule 21 - 26 fit for purpose in the long-term? Does this need extended to avoid the need for these time-consuming ad hoc requests such as:</p>		

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		<ul style="list-style-type: none"> • SHET's request for SHEPD projections out to 2050 for GSP's they are proposing interventions to in their T3 planning • NESO's recent request for projections out to 2035 (even with a 10-year projection the last Week24 submission would still have been a year short for this request) <p>Comment 2:</p> <p>The proposal to separately report >1MW sub-transmission connected and non sub-transmission connected generation, alongside the group demand methodology detailed on page 18 of the draft Planning Code, makes it appear that under the GC1039 changes export from large generators will no longer be treated differently when calculating measured outturns or projections. However this change, in reference to the existing Week24 methodology, has not clearly been stated in any of the documentation. Considering the impact this would have, particularly in the north of Scotland, we believe specific reference to this change of methodology is needed to avoid any confusion.</p> <p>Comment 3:</p> <p>Considering the proposed split in export outturns and projections across technology types how is export from mixed technology sites to be treated in the schedules? A consistent approach across all DNO's needs agreed for how we treat combinations that lie outside the proposed PC.G.8.1 Aggregated Energy Source definitions. In particular, agreement / guidance is needed on how collocated generation and storage is to be treated in both measured outturn and projected export.</p>
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		<p>their associated changes to the PSM. The submitted power system models will be suitable for use in the ETI analysis."</p> <p>Should the models contain detail of customers specific connection requests or the DNO's assumed usage as included in the Schedule 21 projections? Depending on the agreed approach, the models may not match load forecasts included in the schedules and so create confusion over which values are correct. Guidance is required to ensure a consistent approach across DNO's and to ensure TO's are clear what the various sections of the submission contain. The concerns around forecast connection dates for Transmission reliant projects from Comment 4 also apply to the models.</p>
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<p><input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section)</p> <p><input checked="" type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
5	Does the draft legal text satisfy the intent of the modification?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Click or tap here to enter text.</p>
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?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>

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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?	Yes
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?	Yes
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	Yes

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	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?	
10	Is the delivery timescale of January 2026 to transition to a CIM data exchange methodology reasonable and practically achievable?	Considering any required extensions to CGMES v.3 for the purposes of GC0139 have yet to be agreed, with no timescale on expected confirmation provided to date, we have concerns around whether implementation in January 2026 is achievable.
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. There will be costs incurred via the reworking / replacement of existing forecasting processes used to complete the existing Wk24 format. Additional labour will also be required throughout the year to satisfy the increased level of detail needed in the 2nd round of submissions (if thought of as a direct replacement to existing simplified Wk50 process).