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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:	Gavin Sangiovanni	
Company name:	Independent Networks Association	
Email address:	info@ina.org.uk	
Phone number:	N/A	
Which best describes your organisation?	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input checked="" 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?	Mark the Objectives which you believe the Original Solution better facilitates: Original <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
3	Do you have any other comments?	We trust that the competence of the working group was adequate and better than any input we could provide in a short space of time on questions 1 to 8.
4	Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?	<input type="checkbox"/> Yes (the request form can be found in the Workgroup Consultation Section) <input checked="" type="checkbox"/> No Click or tap here to enter text.
5	Does the draft legal text satisfy the intent of the modification?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Click or tap here to enter text.
6	Do you agree with the Workgroup's assessment that the modification does not impact the Electricity Balancing Regulation	<input checked="" type="checkbox"/> Yes

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	(EBR) Article 18 terms and conditions held within the Code?	<input type="checkbox"/> No
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?	Refer to our answer to question 3.
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?	Refer to our answer to question 3.
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 do.
10	Is the delivery timescale of January 2026 to transition to a CIM data exchange methodology reasonable and practically achievable?	<p>DNOs will be familiar with power system modelling, as defined by the requirements of the CGMESv3 standards through their obligations under SLC25, but this skillset will be relatively new to most IDNOs.</p> <p>This mean that the IDNOs who have a direct connection the transmission operator will need to use the time to the implementation date to upskill key members of staff, procure the right technology, and apply it to the relevant connections.</p> <p>We believe that 12 months will allow for that, if the IDNOs, concerned with this code modification, can get some support from the Technical CIM Working Group, or through an alternative forum, to benefit from the extensive knowledge and experience that exists in the industry on the topic.</p>

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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	<p>The costs IDNO will incur will be linked to software upgrade and staff upskilling, in order to meet the new planning code data exchange requirements.</p> <p>This cost has yet to be fully assessed.</p>
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