

Grid Code Workgroup Consultation Response Proforma

GC0106 Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL)

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 by **5pm on 27 April 2018** to grid.code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to Chrissie Brown at Christine.brown1@nationalgrid.com

Respondent:	<i>Mike Kay</i>
Company Name:	<i>Energy Networks Association</i>
Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity 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) iii. 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 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 v. To promote efficiency in the implementation and administration of the Grid Code arrangements. <p><i>The Distribution Code objectives are:</i></p> <ul style="list-style-type: none"> i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity. ii. Facilitate competition in the generation and supply of electricity. iii. Efficiently discharge the obligations imposed upon DNOs

	<p>by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0106 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	No
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

Specific GC0106 questions

Q	Question	Response
5	For those respondents that the Workgroup believes are directly affected by the GC0106 proposal (i.e. (i) new Type A power generating modules of less than 16A per phase, (ii) DNOs and (iii) CDSOs) do you agree with the proposed revised data exchange requirements? Do you have any comments on the drafting of the associated legal text set out in Annexes 4, 6 and 7?	We agree with the revision to data requirements
6	Do you believe that the solution described in this Workgroup Report discharges the legal	Yes – we believe that the proposal correctly interprets and applies SOGL in relation to data requirements.

	obligations of the SOGL and other relevant EU legislation?	
7	For those parties that the Workgroup believes are not directly affected by the GC0106 proposed revised data exchange requirements, do you have any comments on the approach and/or legal drafting?	No comment
8	Do you have any views on the legal interpretation aspects set out in Section 9 together with the explanatory information in Annexes 42 and 43?	We believe that the implications suggested in Annex 2 are incorrect. We believe Annex 3 to be a correct interpretation of the SOGL drafting.
	Legal text comments	
	<i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided here. These will then be discussed at the GC0106 Workgroup meetings planned following the closure of this Consultation.</i>	