Alternative request Proposal form

Grid Code

Modification potential alternative submitted to:

What stage is this document at?

01	Proposed alternative
02	Formal Workgroup alternative

GC0106 [WACM2]

Mod Title: As per original (Ensuring a non-discriminatory approach by the TSO to data provision as well as a 'level playing field' between relevant stakeholders)

Purpose of alternative Proposal: As per the Original.

Date submitted to Code Administrator: 9th May 2018

You are: A Workgroup member

Workgroup vote outcome: Formal alternative

Any Questions?

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1 Alternative proposed solution for workgroup review

During the assessment of the GC0106 Original proposal it was clear that a non harmonised and discriminatory approach to data exchange was to be applied. This is most simply illustrated by examining the table on page 6 of the Workgroup consultation document which clearly shows that a different, non-harmonised, and discriminatory approach is to be applied (according to GC0106 Original) to the data exchange obligations for Type C and for Type D generators in GB.

As the Scope of SOGL (Article 2) makes clear:

> "*The rules and requirements set out in this Regulation shall apply to the following SGUs: (a) existing and new power generating modules that are, or would be, classified as type B, C and D in accordance with the criteria set out in Article 5 of Commission Regulation (EU) 2016/631*"

This is picked up in the data exchange part of the SOGL, namely Title 2, Chapter 1 (Articles 40-53), which refers to SGUs (as well as DSOs and TSO, as applicable) and, in certain specific parts of the relevant Articles, to Type B, Type C and Type D generators.

This, for example, is illustrated by looking at Article 45 (structural data) Article 46 (scheduled data) and Article 47 (real time data) which sets out the various data exchange obligations for transmission connected generators.

In respect of generators connected at distribution level, the data exchange obligations are set out in Article 48 (structural data) Article 49 (scheduled data) and Article 50 (real time data).

The following two Tables set this out in terms of Transmission and Distribution connected generation respectively:

Red – no obligation to provide data
Green – obligation to provide data
Amber – possible obligation to provide data
Purple – data may possibly be provided in aggregate by DSO to TSO, rather than by the generator

Table 1 - Transmission connected				
Article	Paragraph	Type B	Type C	Type D
45	1			
	2			
	3			
46	1			
47	1			

Table 2 - Distribution connected				
Article	Paragraph	Type B	Type C	Type D
48	1			
	2			
49	[1]			
50	1			

That this common minimum requirement, for example, in terms of real time data exchange (for both Transmission and Distribution connected generation) applies to Types B, C and D generators (and not Type A) is not surprising as it was set out by ENTSOE back in November 2016 when; in setting the real data capabilities that newly connecting generator plant had to be equipped to provide; it was noted by ENTSOE that:

> "….*the mere capability to exchange information is required for all SGU's, except Type A generators and demand facilities*."

The following paragraph from ENTSOE stated that:

> *"Through the implementation of the Guideline on transmission system operation (SO GL) a methodology will be created where the generic rules will be specified to the required details*."

As ENTSOE noted, the data exchange aspects, in turn, stem from the ACER Framework Guidelines which established:

> "*Paragraph 3.1: "… The network code(s) shall set out the procedures and requirements to coordinate and ensure information sharing between … System operator and significant grid user …"."These procedures and requirements shall be defined with the agreement of all affected parties".*
> *Paragraph 3.2: "… The network code(s) shall set the requirement for every significant grid user to be able and obliged to provide the necessary real-time operational information to the DSO and TSO that their connection has significant impact upon. The network code(s) shall set the requirement for every significant grid user to be able to receive and to execute the instructions sent by the TSO and/or DSO, on a contractual basis or in critical operating state."*
>
> ACER FWGL also states that the network code(s) shall define a harmonized standard according to which information shall be provided for grid connection at the connection point by TSO and DSO.
>
> Similarly, the network code(s) shall define what information and technical data the significant grid user has to provide to the TSO or DSO to which it is connected and how this data is to be provided to ensure the operational security of the system. "

As set out in GC0100 the proposed size banding[1] in GB for generators will be[2]:

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[1] Any generator connected at 110kV or above would be classified as Type D.

[2] As at the date of writing this WACM, 9th May 2018, Ofgem has still to opine on GC0100.

Either (GC0100 Original):

Type B 1-9.9MW, Type C 10-49.9MW and Type D 50MW+

Or (GC0100 WACM1):

Type B 1-49.9MW, Type C 50-74.9MW or Type D 75MW+

This GC0106 Alternative proposal would ensure that, based on the generator Types set out in the SOGL, that all GB generators (be they new or existing[3]) of the three respective types of generator (Types B, C and D) will provide the requisite scheduled, structural and real time data in accordance with the SOGL (as summarised in the above two tables), depending upon the network they are connected at.

This will ensure that a level playing field, as regards data exchange requirements, is applied to all these new and existing generators across GB.

For transmission connected generators:

All Type B (T connected) generators will be treated the same as any other Type B (T) generator, all Type C (T) generators will be treated the same as any other Type C (T) generator and all Type D (T) generators will be treated the same as any other Type D (T) generator.

For distribution connected generators:

All Type B (D connected) generators will be treated the same as any other Type B (D) generator, all Type C (D) generators will be treated the same as any other Type C (D) generator and all Type D (D) generators will be treated the same as any other Type D (D) generator.

Thus, for example, assuming that Ofgem approves GC0100 (Original) then (with this GC0106 Alternative proposal) <u>any</u> transmission connected generator in GB that is between 10-49.9MW (and not connected at 110kV) would, as Type C, be required to provide the data items set out in Article 45 (2) (and possibly (3)), Article 46 (1) and Article 47(1) irrespective of whether, currently, they are classified as 'small', 'medium' or 'large'.

A similar approach would also be applied in terms of Types B and D generators that are transmission connected.

Equally, assuming that Ofgem approves GC0100 (Original), then (with this GC0106 Alternative proposal) <u>any</u> distribution connected generator in GB that is between 10-49.9MW (and not connected at 110kV) would, as Type C, be required to provide the data items set out in Article 48 (1) & (2), Article 49 (1) and Article 50 (1)[4] irrespective of whether, currently, they are classified as 'small', 'medium' or 'large'.

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[3] As defined within the respective EU Network (Codes) Guidelines / Regulations.

[4] The data may possibly be provided in aggregate by DSO to TSO, rather than by the generator.

A similar approach would also be applied in terms of Types B and D that are distribution connected.

For the avoidance of doubt, this Alternative proposal would only apply the data exchange requirements on GB generators in accordance with the SOGL (as summarised in the above two Tables).

This means, for example, that all Type B and Type C generators (transmission connected) would not need to provide the structural data items listed in paragraph 1 of Article 45 and, equally, all Type D generators (transmission connected) would not need to provide the structural data items listed in paragraph 2 of Article 45.

Currently the GC0106 (Original) proposal, as summarised in the Table on page 6 of the Workgroup consultation document, would treat some Type C generators in GB differently from each other. A similar approach is applied to Type D generators as well. Not only is this a non harmonised approach it is also discriminatory. In addition it is not a level playing field.

In terms of harmonisation, it is a requirement of SOGL that a harmonised approach is applied and the importance of this is witnessed by it being the third Recital of the Regulation:

> *"(3) Harmonised rules on system operation for transmission system operators ('TSOs'), distribution system operators ('DSOs') and significant grid users ('SGUs') should be set out in order to provide a clear legal framework for system operation, facilitate Union-wide trade in electricity, ensure system security, ensure the availability and exchange of necessary data and information between TSOs and between TSOs and all other stakeholders, facilitate the integration of renewable energy sources, allow more efficient use of the network and increase competition for the benefit of consumers."*

In terms of non-discrimination, Recital (13) as Article 4 of SOGL makes clear that:

> *"(13) The provisions on LFC and reserves, aim at setting out clear, objective and harmonised requirements for TSOs, reserve connecting DSOs, providers' power generating modules and providers' demand facilities in order to ensure system security and to contribute to non-discrimination, effective competition and the efficient functioning of the internal electricity market. The provisions on LFC and reserves provide the technical framework necessary for the development of cross-border balancing markets."*

The linkage of Recital (13) to data exchange is shown by reference, for example, to Article 45 (1) (e), (f) & (g), Article 45 (2) (c), (d) & (e) and Article 48 (1) (b), (c) & (d).

Note: This WACM2 assumes that all other aspects of the GC0106 (Original) applies and this means that the **'***TSO to provide where DSOs/SGUs do not provide*' matter (set out in WACM1) would not apply to this WACM2.

For the avoidance of doubt, this would mean that if the TSO, for example, 'provided' that Type C generators did not need to provide, as per Article 47 (1) (c), "*in the case of power generating facility with consumption other than auxiliary consumption net active and reactive power*" then no Type C generator in GB would need to provide this real time data item.

However, with WACM2, it would not permit the TSO to adopt a non harmonised and/or a discriminatory approach in terms of the TSO 'providing' that certain Type C generators would, and some Type C would not, need to provide (in this example) this real time data item.

2 Difference between this proposal and Original

This Alternative proposal will use all the same changes in the Original GC0106 proposal except where the Original proposal deals with the data items related to the Articles listed in (1) above; where this Alternative proposal will make it clear that a harmonised and non-discriminatory approach (as detailed in (1) above) will be applied (rather than the GC0106 Original approach).

3 Justification for alternative proposal against Grid Code objectives

The justification for this Alternative proposal is as set out in (1) above in that is applies a harmonised and non-discriminatory solution to the GC0106 defect.

Impact of the modification on the Relevant Objectives:	
Relevant Objective	**Identified impact**
To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	**Positive**
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)	**Positive**
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	**Positive**

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	**Positive**
To promote efficiency in the implementation and administration of the Grid Code arrangements	**Neutral**

By clarifying that a harmonised and non-discriminatory solution to the GC0106 defect will be applied, this Alternative proposal will ensure that the Authority will be able to implement the proposal (be that the Original or the Alternative) that ensures legal compliance with EU law.

4 Impacts and Other Considerations

As per the Original.

Consumer Impacts

As per the Original.

5 Implementation

As per the Original.

6 Legal Text

As per the Original, except with respect to those Articles related to:

For transmission connected generators:

Article 45 (structural data);
Article 46 (scheduled data); and
Article 47 (real time data).

For distribution connected generators:

Article 48 (structural data);
Article 49 (scheduled data); and
Article 50 (real time data).

Where it will be clear that a harmonised and non-discriminatory application of the SOGL will be applied, as summarised in Tables 1 and 2:

Table 1 - Transmission connected				
Article	Paragraph	Type B	Type C	Type D
45	1			
	2			
	3			
46	1			

47	1			

Table 2 - Distribution connected

Article	Paragraph	Type B	Type C	Type D
48	1			
	2			
49	[1]			
50	1			

Thus, for example, Type B and Type C generators (transmission connected) would not need to provide the structural data items listed in paragraph 1 of Article 45 and, equally, Type D generators (transmission connected) would not need to provide the structural data items listed in paragraph 2 of Article 45.

[end]