Grid Code Review Panel

GC0083: European Transparency Regulation Implementation

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National Grid

Summary

The European Transparency Regulation (ETR) sets out a requirement for the publication of a common set of data relating to generation, transmission and electricity consumption. It places an obligation on primary owners to submit this data to a central information transparency platform via the Transmission System Operators (TSOs). Although much of the data required is already collected by National Grid under existing industry framework processes, three articles of the regulation will require the provision of additional information. National Grid would like to amend the Grid Code to facilitate the collection of the additional data required for the implementation of ETR which is set for 4 January 2015.

Users Impacted

High

None identified

Medium

Transmission Owners, Small Generators, Medium Generators, Large Generators, System Operator, Distribution Network Operators

Low

None identified

Description & Background

The European Transparency Regulation (543/2013)[1] published on the 14th June 2013 lays down the requirements for the publication of a common set of data relating to generation, transportation and consumption of electricity. It places an obligation on primary data owners (Demand and Generation units) to submit information to the TSO which then is required to forward the collected data to a central information transparency platform set up by ENTSO-E. National Grid in its role of GB TSO conducted a study to ascertain the impact of the ETR implementation. It concluded that for the TSO to fully comply with the regulation, additional data will need to be collected. Three articles will require changes to the Grid Code. These are:

- **Article 7** requires the reporting of planned unavailability of demand units (Transmission and DNO connected) greater or equal than 100MW. Outage periods lasting at least one settlement period (i.e. half an hour), aggregated by bidding zone, should be published as soon as possible but no later than 1 hour after the decision regarding the planned outage was made. Similarly, changes in actual availability of demand units with a rating of 100MW or more should be published as soon as possible but no later than 1 hour after the actual change took place.

- **Article 14.1.a** requires the reporting of the total sum of generation with installed

[1] http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF

capacity equal or greater than 1 MW per production type. This information is required to be published annually no later than 1 week before the end of the year.

- **Article 15** refers to the publication of planned and unplanned unavailability data for a single generation unit (BMU level) equal or greater than 100MW or a group of generation units (power station level) equal or greater than 200MW. For outages expected to last for at least one settlement period up to three years ahead

On 6 November 2013 National Grid held an industry workshop to confirm the additional data required from industry participants and also to discuss options for receiving this data. This was followed by an industry consultation on 4 December 2013. A copy of the report can be found in appendix 1.

Proposed Solution

It is proposed that the Grid Code is modified to request industry parties to provide the additional information needed to comply with this legislation.

This paper does not address changes to the Grid Code as a result of Article 14.1.a which are currently being progressed by a separate proposal resulting from Workgroup GC0042 - Information on Small Embedded Power Stations and Impact on Demand.

The data required for the remaining articles is as follows:

Article 7 - Information relating to unavailability of consumption units

1. Bidding zone
2. Available capacity during the event (MW)
3. Start and end date and time (dd.mm.yy hh:mm)
4. Reason for outage

Consumption units are equivalent to demand units. The bidding zone refers to the largest geographical area within which market participants are able to exchange energy without capacity allocation.

Data for unplanned outages (items 1 to 3) is currently known or collected by the BM system. Planned outage information for the same items is not currently collected by National Grid.

The input options available for item 4 could be:

- maintenance
- failure (permitted for changes in actual availability only)
- shutdown
- other

Both planned and unplanned data for item 4 is not currently collected by National Grid.

The legislation states that the above data shall be published as soon as possible but no later than one hour after decision is made or the event has happened.

Article 15 - Information relating to the unavailability of Generation with a minimum installed capacity of 100 MW and Production units with a minimum installed capacity of 200MW.

1. Generation and/or Production unit name
2. Location (cross-zonal or intra-zonal)
3. Bidding zone
4. Installed capacity (MW)
5. Production type
6. Available capacity during the event
7. Start date and estimated end date (dd.mm.yy hh:mm)
8. Reason for outage

A Generation unit is defined as a single electricity generator belonging to a Production unit. For GB a generation unit is equivalent to a BMU. A Production unit is a facility for generation of electricity made up of a single or a collection of Generation units. Their equivalent in GB is a power station. Location refers to whether the transmission assets are located between bidding zones or inside a bidding zone.

At BMU level, data for items 1 to 7 is currently known or collected by National Grid via TOGA (for planned outages) and the BM system (for unplanned outages).

Input options potentially available for item 8 could be:

- maintenance
- outage
- external factors
- other

Data for item 8 is not currently collected by National Grid.

It is worth noting that outage information in relation to Production units (BMUs aggregated form) is not currently available to National Grid.

Similarly to Article 7, the legislation states that the above data shall be published data as soon as possible but no later than one hour after decision is made or the event has happened.

Following the industry consultation on the 4th December 2013, National Grid is finalising the options for the collection of the above information. This would involve changes to existing IT systems and/or the potential for the introduction of a new IT interface.

Assessment against Grid Code Objectives

(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;

The proposed modifications would facilitate the collection of additional information that would help the GB TSO to better reallocated reserves and promote efficiency in the operation of the Transmission Network.

(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);

Equal access to information in a timely manner would ensure a level playing field for market participants.

(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; and

The proposed changes better facilitate this objective because additional information would result in increased security of supply.

(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.

The proposed changes would allow us to discharge our obligations with regards to the European Transparency Regulation.

Impact & Assessment

Impact on the National Electricity Transmission System (NETS)

No

Impact on Greenhouse Gas Emissions

The proposed changes will not have a material impact on Greenhouse Gas Emissions

Impact on core industry documents

BSC, Grid Code

Impact on other industry documents

None

Supporting Documentation

Have you attached any supporting documentation Yes

If Yes, please provide the title of the attachment:

Study on the impact of the European Transparency regulation implementation

Recommendation

The Grid Code Review Panel is invited to:

Recommend that this issue is progressed to Industry Consultation

Document Guidance

This proforma is used to raise an issue at the Grid Code Review Panel, as well as providing an initial assessment. An issue can be anything that a party would like to raise and does not have to result in a modification to the Grid Code or creation of a Working Group.

Guidance has been provided in square brackets within the document but please contact National Grid, The Code Administrator, with any questions or queries about the proforma at grid.code@nationalgrid.com.

European Transparency Regulation Implementation

Regulation 543/2013

About this document

This document gives a brief background to the European Transparency Regulation and the proposed National Grid solution for the GB implementation of the Regulation.

The purpose of the document is to confirm the additional data that will be required from industry participants to meet the Regulation and to obtain industry feedback, specifically on National Grid proposals to receive this data and more generally on the implementation of the Articles for which no new data will be required.

There a number of questions listed throughout the document; these are also shown in Annex 1. Please submit a response to these questions and any other comments or feedback to balancingservices@nationalgrid.com no later than the 18th December 2013.

Should you wish to discuss any part of this document, please contact Tariq Hakeem on 01926 655 439 or by email at tariq.hakeem@nationalgrid.com.

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Any Questions?

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Document Control

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1.0	4 December 2012	National Grid	Issued to industry

1 Executive Summary

1.1 The European Transparency Regulation (ETR) came into force on 4th July 2013 and has an implementation date of 4th January 2015. The Regulation sets out a requirement for the publication of a common set of data relating to the generation, transportation and consumption of electricity. It places an obligation on primary owners of this data to submit information to National Grid as SO and GB Data Provider for onward transmission to a Central European Platform (EMFIP).

1.2 The European Transparency Regulation has an interaction with BSC Modification P291 which introduced a REMIT[3] inside information publication page on the BMRS. Parties have the option to submit REMIT outage notifications via National Grid for onward submission to the BMRS. The ETR requires the mandatory publication of all outage data and so REMIT outage notifications will represent a subset of the outage information reported under Transparency.

1.3 National Grid has raised BSC Modification P295 to propose that Elexon is the conduit to whom National Grid submits ETR data and which Elexon then submit to EMFIP (and publish on the BMRS). P295 will go to Ofgem for a decision in December 2013. The P295 implementation date is the 16th December 2014, in advance of the formal ETR implementation date of 4th January 2015.

1.4 National Grid has carried out an analysis of the data required under the ETR; much of the data required is already submitted to National Grid under the existing industry framework and processes and National Grid is undertaking significant changes to its internal IS systems and business processes in order to deliver this data to EMFIP. However, to fully meet the ETR requirements there are four areas which will require additional data submissions from industry participants.

1.5 The four areas requiring additional data are listed in Section 2.1. Section 3 covers the options to receive this data. Section 3 also captures the P291 REMIT requirements which, whilst not part of the Transparency Regulation, have a close linkage to the Article 15 requirements.

1.6 National Grid held an IS workshop which was open to industry participants on the 6th November 2013, this workshop discussed the possible options to obtain the data required under 1.5 and obtained feedback and industry views on those options. The questions included as part of this document are to obtain the views of industry parties who were not present on the 6th November 2013.

What is the European Transparency Regulation[2]?

The European Transparency Regulation (543/2013) was formally published on the 14th June 2013. It requires the establishment by the European Network of Transmission System Operators for Electricity (ENTSO-E) of a central information transparency platform. TSOs are required to submit data in accordance with the Regulation to ENTSO-E who is then required to publish the information on the central platform. The Transparency Regulation has an implementation date of the 4th January 2015.

[2] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF

[3] EU regulation No 1227/2011 on wholesale energy market integrity and transparency (REMIT) has been in force since 28 December 2011. REMIT is aimed at preventing market abuse in wholesale energy markets. P291 introduced an outage publication page on the BMRS. Information will start to be published on the BMRS from December 2014.

2 Additional data requirements

2.1 There are four areas of the Transparency Regulation under which more information is required from industry participants. These are listed below.

- Article 7 – Information relating to the unplanned and planned unavailability of transmission and DNO connected demand units greater than a threshold value (>=100MW);
- Article 10.1c – Information relating to the unavailability of OFTO infrastructure, if the unavailability has an impact on actual wind power feed-in greater than a threshold value (>=100MW);
- Article 14.1a – Publication of the sum of generation capacity >= 1MW;
- Article 15 – Information relating to the unavailability of generation and production units greater than a threshold value (>=100MW);

2.2 The ETR can be viewed at the link below; Articles 6 to 17 refer to the data reporting requirements.

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF

2.3 Information will also be required from some industry participants for the P291 REMIT requirements which, whilst not part of the Transparency Regulation, have a close linkage to the Article 15 requirements. The submission of REMIT data, via National Grid, for onward submission to the BMRS is optional. Parties can also submit REMIT data direct to Elexon.

3 Data receipt options

3.1 Generally there are only one or two options to efficiently receive the additional data required.

3.2 For planned outage data requirements (Article 7, 15 and REMIT) the utilisation of existing IT systems (modified as required) such as TOGA[4] or the introduction of a new specific Transparency interface system.

3.3 For unplanned outage data requirements (Article 7, 15 and REMIT) the submission of data via:

- Modifications to the current EDL/EDT interfaces;
- Modifications to the new EDL*/EDT* interfaces, with mandatory early adoption of EDL*/EDT* (for Transparency) or optional early adoption (for REMIT submissions)
- Submission of new data items via a new ETR-specific interface (or a modified existing system (TOGA)

3.4 For unplanned outage data requirements, for Article 10.1c, the submission of data via TOGA or a new specific Transparency interface system.

3.5 For annual data requirements (Article 14.1a), submission via existing business processes.

What data needs to be published under the Regulation?

Articles 6 to 17 of the Regulation set out the data that needs to published.

The data ranges from actual and forecast demands (Article 6); the unavailability of large demand units (Article 7); Year-ahead margin forecasts (Article 8); Transmission Infrastructure changes impacting interconnectors (Article 9); Unavailability of Transmission Infrastructure impacting Interconnectors or Wind feed-in (Article 10); information on the offer and use of interconnector capacity (Article 11 and 12); information on congestion management measures (Article 13); forecast generation (Article 14); generation unavailability (Article 15); actual generation (Article 16) to information on balancing (Article 17)

[4] Transmission Outage and Generator Availability

Q1. Do you have any comments on sections 3.1 to 3.5 including the utilisation of TOGA versus a new specific transparency interface?
You can give your views using the form in Annex 1

Discussion around the data receipt options

3.6 The IS Workshop discussed if it would be feasible to use default reason codes for some of the new data requirements in order to minimise IT changes. However following discussions it was felt that default reason code usage was not the intention of the Regulation.

3.7 The workshop discussed the options to modify current EDL/EDT interfaces and felt this would be difficult to achieve in the relevant timescales and with the move to EDL*/EDT* not efficient. Early adoption of EDL*/EDT* may also be problematic for some parties.

Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT may be difficult to achieve for the option listed in the bullet point 1 of 3.3?
You can give your views using the form in Annex 1

Q3. Do you have any comments on the workshop view in relation to the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?
You can give your views using the form in Annex 1

Q4. What is your preference of the options listed under 3.3?
You can give your views using the form in Annex 1

Q5. Do you have any other comments on potential data receipt option?
You can give your views using the form in Annex 1

Article 7 data requirements

3.8 The Transparency Regulation requirements for Article 7 can be viewed using the link in Annex 2 of this document. Article 7 requires the reporting of the planned and unplanned unavailability of consumption units over a 100MW threshold value, with the unavailability lasting at least one settlement period. The information is required from the consumption unit as soon as possible but no later than 1 hour after the change in actual availability.

3.9 A consumption unit is defined in the Transparency Regulation as meaning a 'resource receiving electrical energy for its own use, excluding TSOs and DSOs (Distribution System Operators)'. In a GB context this equates to both Transmission and DNO connected individual demand sites.

3.10 There are a number of individual demand units registered as BMUs with Elexon and National Grid, exceeding the 100MW threshold limit. National Grid has also contacted DNOs to find out how many, if any, DNO connected demand units meet the threshold; these will also be required to submit the data. Only a very limited number of DNO demand units meet the Transparency Regulation threshold.

3.11 Article 7 refers to settlement periods; for the GB market, these are the half-hour settlement periods beginning every hour and at 30 minutes past every hour.

3.12 Article 7 also refers to "unavailability of consumption units". In a GB context, this refers to a gap between the registered capacity of consumption units and the actual amount of electricity they are able to consume in a given settlement period (MIL – Maximum Import Limit); for BMUs, this is the gap between registered capacity and MIL. The gap only needs to be reported where it exceeds 100MW.

3.13 The information will be published in aggregated form on EMFIP and indicate the sum of unavailable consumption capacity per settlement period. Whilst the information will be published in aggregated form on EMFIP, submission of the information to EMFIP will be in a disaggregated form. A draft form of the REMIT implementing acts, under discussion between ENTSO-E and ACER states that's that Article 7(1) information shall be provided to ACER in disaggregated form including the name and location of the consumption unit referred.

3.14 As Article 7 will require information from both Transmission connected demand and DNO connected demand and, because this will include units who do not have existing EDL/EDT links and infrastructure in place, the EDL/EDT and EDL*/EDT* options discussed in 3.3 are not appropriate and submission of Article 7 data through TOGA and/or a new ETR-specific interface may be more suitable.

3.15 Transmission connected demand units currently submit Maximum Import Limit (MIL) data as required under the Grid Code and whilst information submitted under MIL meets some of the requirements (or could be derived to meet some of the requirements) of Article 7 it does not meet all the requirements and is not submitted by all of the individual units that will be required to submit Article 7 data.

Proposed submission of data for Article 7 by individual GB demand units meeting the threshold.

3.16 National Grid will provide an ETR specific interface for the submission of data required under Article 7, the planned requirements may need to be submitted via existing systems (TOGA) or alternatively (depending on final costing) the planned requirements may be incorporated into a ETR specific interface. Demand units will be responsible for the submission of data as required under Article 7, including reason for unavailability, with National Grid submitting all the information for onward aggregated publication on EMFIP. The ETR specific interface will allow entry by individual demand units it will incorporate functionality for a system to

system interface for automated submissions and may include a manual submission method.

3.17 Existing submission of MIL data will not be affected by the Article 7 solution and will continue as current.

Q6. Do you have any comments on the section titled Article 7 data requirements?
You can give your views using the form in Annex 1

Article 10.1c data requirements

3.18 The Transparency Regulation requirements for Article 10.1c can be viewed using the link in Annex 2 of this document. Article 10.1c requires the reporting of changes in the actual availability of off-shore grid infrastructure that reduces wind power feed-in by 100MW or more for at least one settlement period. The information is required to be published as soon as possible but no later than 1 hour after the change in availability.

3.19 Article 10.1c requires the reporting of real-time outages but only when those outages restrict wind-power feed-in by more than 100MW. Under this criteria a planned outage would not need to be reported, an incident would also not need to be reported if the reason for the wind power feed-in restriction was because of on-shore DNO or Transmission restrictions.

3.20 The occurrence of reported incidences under Article 10.1c is anticipated to be relatively low. National Grid publish an annual report listing the performance of the National Electricity System, the 2012/13[5] report saw one unplanned OFTO outage (due to a lightning strike), and which lasted 30 hours. That incident would likely have been reportable under Article 10.1c.

3.21 The information currently reported from OFTOs in respect of planned and unplanned outages is not all captured via a single system or does not fully capture all the requirements required under the Transparency Regulation (such as flagging reportable incidents).

Proposed submission of data for Article 10.1c by OFTOs.

3.22 National Grid will provide an ETR specific interface for the submission of data required under Article 10.1c, although submission may be via existing systems (TOGA), depending on final costing. OFTOs will be responsible for the submission of data as required under Article 10.1c, including reason for unavailability, with National Grid submitting all the information for onward publication on EMFIP. The interface may allow entry by OFTOs via a manual web portal.

3.23 Existing submission of OFTO planned and unplanned outage information will not be not be affected by the Article 10.1a solution and will continue as current.

[5] http://www.nationalgrid.com/NR/rdonlyres/83A0A21D-4267-4983-8109-AA9A4E7B83FD/62630/NationalElectricityTransmissionSystemPerformanceReport20122013.pdf

Q7. Do you have any comments on the section titled Article 10.1c data requirements?
You can give your views using the form in Annex 1

Article 14.1a data requirements

3.24 The Transparency Regulation requirements for Article 14.1a can be viewed using the link in Annex 2 of this document. Article 14.1a requires the publication of the sum of generation units >= 1MW. The information is required to be published annually no later than one week before the end of the year, the first required formal publication will thus be in December 2015 (following the formal Transparency implementation date of 4th January 2015).

3.25 Some information relating to this is already captured by National Grid via existing business processes however in order to fully capture all the data required for this additional information in relation to small scale generation will be required and it is proposed that DNOs submit this information to National Grid.

Proposed submission of data for Article 14.1a by DNOs.

3.26 Article 14.1.a requires the submission of data to EMFIP on an annual basis and it is proposed that the process of obtaining data from DNOs in relation to small scale generation will be incorporated into existing DNO-National Grid business processes.

Q8. Do you have any comments on the section titled Article 14.1a data requirements?
You can give your views using the form in Annex 1

Article 15 data requirements

3.27 The Transparency Regulation requirements for Article 15 can be viewed using the link in Annex 2 of this document. Article 15 requires the reporting of information relating to the available capacity during planned and unplanned outages of generation and production units (exceeding a threshold value).

3.28 Generation and production units are both defined under Article 2 of the regulation; a 'generation unit' is a single electricity generator belonging to a production unit. A 'production unit' means a facility for generation of electricity made up of a single generation unit or of an aggregation of generation units. For GB, a generation unit is considered to be a BMU with the production unit a power station consisting of several BMUs.

3.29 Article 15 refers to settlement periods; for the GB market, these are the half-hour settlement periods beginning every hour and at 30 minutes past every hour.

3.30 Article 15 also refers to "unavailability of production/generation units". In a GB context, this refers to a gap between the registered capacity of BMUs/Stations and their declared Maximum Export Limit (MEL) in a given

settlement period. The gap only needs to be reported where it exceeds 100MW, and where this occurs for at least one settlement period.

3.31 In relation to reporting at a station level, this is only applicable for stations with a capacity of over 200MW. For such stations, changes of 100MW or more are reported, assuming they have not already been reported at the BMU level. The reporting is of availability data (available capacity during event), along with reason for decreased MEL.

3.32 Outage information is already submitted in relation to BMUs through existing industry processes however the information submitted does not completely capture the requirements of the Transparency Regulation. Outage information in relation to Production units is not submitted through existing processes and would be a new requirement.

3.33 As noted in 3.28 a Production unit consists of an aggregation of generation units. Under the Transparency Regulation the threshold for a production unit to report information under Article 15 is 200MW; the threshold for a generation unit to report data is 100MW. In some instances reporting might be required at the generation unit level and not production unit level and vice versa. The table below show the different reporting options under three different generation set-ups.

Production Unit ABCD - 400MW consisting of	**Production Unit EFG - 270MW consisting of**	**Production Unit HJ - 200MW consisting of**
Generation unit A 150MW Generation unit B 125MW Generation unit C 75MW Generation unit D 50MW	Generation unit E 90MW Generation unit F 90MW Generation unit G 90MW	Generation unit H 125MW Generation unit J 75MW
The total generation for this production unit combines to 400MW and so exceeds the 200MW threshold specified in the Transparency Regulation.	The total generation for this production unit combines to 270MW and so exceeds the 200MW threshold specified in the Transparency Regulation.	The total generation for this production unit combines to 200MW and so meets the 200MW threshold specified in the Transparency Regulation.
Generation Units A and B exceed the 100MW threshold specified in the Transparency Regulation with Units C and D below the threshold.	All the generation units are below the 100MW threshold specified in the Transparency Regulation	Only generation unit H is above the 100MW threshold specified in the Transparency Regulation
An outage of 100MW or more for Units A and B would be reportable at the generation unit level	An outage on any individual generation unit would not need to be reported on a generation unit level	An outage on unit J would not need to be reported on the generation unit level
An outage for units C and D would not be reportable under the Generation unit (as both are below the 100MW level) but an outage of 60MW on any two units at the sametime would be reportable under the Production unit level as the total is over 100MW	An outage on more than one generation unit which exceed the 100MW threshold limit (in total) would be reportable at the Production Unit level	An outage on both units H and J would need to be reported on a production unit level, although unit H would be reported on the generation unit level. An outage of 75MW on unit H and 25MW on unit J would need to be reported on a Production unit level.

3.34 Article 15 of the Transparency Regulation has a close relationship with REMIT reporting requirements. P291 proposes to introduce a REMIT inside information reporting platform to the Balancing Mechanism Reporting System (BMRS) website. Participants will be able to submit messages to this platform through existing Grid Code submissions, or through the ELEXON Portal, provided they have the necessary authorisation. The 'inside information' that can be reported via National Grid will relate to outages.

3.35 A significant portion of the data reportable under Transparency and REMIT has commonality. Whilst field names are different, some of the data to be reported shares similarity across the two requirements. However, the REMIT requirements relate only to generation units not production units.

3.36 Article 15 will require information from both Transmission connected generation and DNO connected generation, all units who will submit data have existing EDL/EDT links and infrastructure in place, the EDL/EDT and EDL*/EDT* options discussed in 3.3 may be appropriate alongside the submission of data through TOGA and/or a new ETR-specific interface.

Proposed submission of data for Article 15 and REMIT by generation and production units.

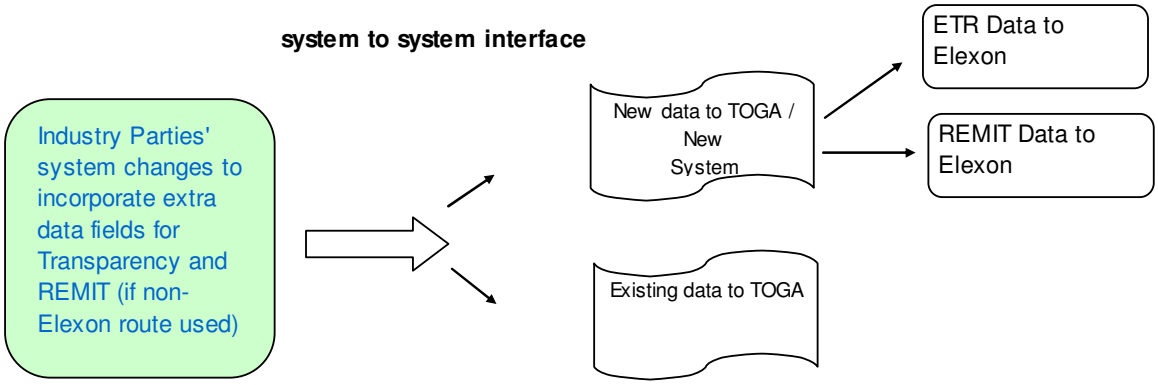
3.37 National Grid will provide an ETR specific interface for the submission of data required under Article 15 and REMIT, the planned requirements may need to be submitted via existing systems (TOGA) or alternatively (depending on final costing) the planned requirements may be incorporated into the ETR specific interface. The ETR specific interface will allow entry by individual generation and production units via a manual web portal and it will also incorporate functionality for a system to system interface.

3.38 It is proposed that unplanned generation or production unit changes (and REMIT submissions) are submitted via the early adoption of EDL*/EDT* or through a specific ETR interface. The ETR specific interface will allow entry by individual generation and production units via a manual web portal and it will also incorporate functionality for a system to system interface.

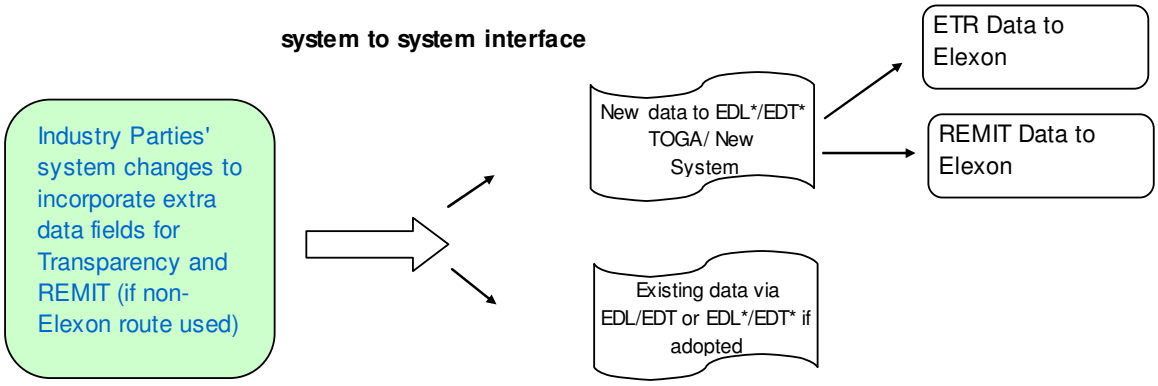
3.39 Existing submission of MEL data will not be affected by the Article 15 solution if the early adoption of EDL*/EDT* is not taken forward and will continue as current.

3.40 The diagram shows the solution

Planned outages



Unplanned outages



Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon's platform?
You can give your views using the form in Annex 1

Q10. Do you have any comments on the section titled Article 15 data requirements?
You can give your views using the form in Annex 1

4 Other Articles

4.1 The Transparency Regulation requires the submission of a large volume of data to EMFIP; there are twelve Articles listed in the Transparency regulation. Some of these Articles are outside the scope of National Grid and fall under the remit of Interconnectors. This section outlines each Article that has not been covered under Section 3, the requirements and how at a high level National Grid proposes to meet the Regulation.

4.2 The Transparency Regulation references Regulation 714/2009, specifically Article 15 of 714/2009. Article 15 covers the provision of information, section 4 of Article 15 states '……For availability and actual use of small generation and load units, aggregated estimate data may be used'.

Article 6

4.3 The Transparency Regulation requirements for Article 6 can be viewed using the link in Annex 2 of this document. Article 6 requires the reporting of 'Information on total load' across various timescales including for each settlement period (no later than 1 hour after the settlement period) and for day-ahead, week-ahead, month-ahead and year-ahead forecasts. Total load is a defined term under the Transparency Regulation and means 'a load equal to generation and any imports, deducting any exports and power used for energy storage', it includes losses.

4.4 The Article 6 requirements do not specify a minimum threshold limit for the inclusion within the Load reporting requirement, which could potentially mean a requirement of real-time metering on all generation and demand. However, as stated under 4.2, Article 15 of 714/2009 allows small generation and load units data to be estimated.

4.5 Total Load for historical settlement period reporting will be calculated as follows:

Total Load = Net Generation (Metered Generation + Metered STOR[6] + Wind Forecast Estimate + Solar Forecast Estimate + Industrial Generation Forecast Estimate) – Interconnector Exports + Interconnector Imports – Absorbed Energy (Pump Storage Demand)

[6] Short Term Operating Reserve

4.6 Total Load for future reporting periods will be calculated in the same manner as above.

Article 8

4.7 Article 7 of the Transparency Regulation is covered under section 3.7 to 3.15. The Transparency Regulation requirements for Article 8 can be viewed using the link in Annex 2 of this document. Article 8 requires the reporting of a year-ahead forecast margin. The information is required to be published no later than the 15th calendar day of the month before the year to which the data relates to (i.e. the 15th December). There is a single reportable value for a year.

4.8 National Grid already receives information from generators as to their availability for future periods; the year-head forecast value will be derived using these values together with demand estimates.

Article 9

4.9 The Transparency Regulation requirements for Article 9 can be viewed using the link in Annex 2 of this document. Article 9 requires the reporting of Transmission Infrastructure projects. Information is required on future changes to Transmission and Interconnector projects within the next three years, which will have an impact of at least 100MW on cross zonal capacity. The information is required to be published no later than the 15th calendar day of the month before the year to which the data relates to (i.e. the 15th December), updated before the end of the following March, June and September.

4.10 Article 9 is a requirement that falls on both National Grid and existing Interconnectors. National Grid will submit information on transmission infrastructure projects impacting interconnector capacity by at least 100MW, and will also submit information on new build interconnector infrastructure (excluding expansions/changes of existing interconnector's capacity).

Article 10

4.11 The Transparency Regulation requirements for Article 10 can be viewed using the link in Annex 2 of this document. Section 3.18 to 3.23 covers requirement 10.1.c which relates to OFTO information. However 10.1a and 10.1b requires the publication of information relating to the unavailability of transmission infrastructure. 10.1a and 10.1b requirements, similar to Article 9, fall on both Interconnectors and National Grid. Information is required on the planned and unplanned availability of Transmission infrastructure and Interconnector infrastructure which impacts interconnector capacity by at least 100MW for at least one settlement period.

4.12 National Grid will submit information on transmission infrastructure changes impacting interconnector capacity by at least 100MW.

Articles 11 and 12

4.13 The Transparency Regulation requirements for Articles 11 and 12 can be viewed using the link in Annex 2 of this document. Article 11 requires

reporting on 'Information relating to the estimation and offer of cross zonal capacities' and Article 12 requires reporting on 'Information relating to the use of cross zonal capacities'.

4.14 The reporting requirements under both articles are the responsibilities of Interconnectors and National Grid will not be reporting any information in relation to them.

Article 13

4.15 The Transparency Regulation requirements for Article 13 can be viewed using the link in Annex 2 of this document. Article 13 requires the reporting of 'Information relating to congestion management measures'.

4.16 13.1a requires the reporting of information relating to redispatching of generation or demand in a settlement period along with the interconnector capacity affected by the action. In GB terms, redispatching refers to BOAs. BOAs issued by National Grid should not impact interconnector capacity and this requirement is deemed to have no impact on National Grid.

4.17 13.1b requires the reporting of information relating to cross-zonal countertrading with the information required to the reported no later than 1 hour after the settlement period. National Grid will report on interconnector trades.

4.18 13.1c requires the reporting of information relating to the costs incurred under 13.1a and 13.1b.

Article 14

4.19 The Transparency Regulation requirements for Article 14.1a can be viewed using the link in Annex 2 of this document. Section 3.24 to 3.26 covers 14.1a which requires the publication of the sum of generation units >= 1MW.

4.20 Article 14.1b requires the publication of information relating to existing and planned generation units exceeding 100MW. National Grid will use information it holds on units meeting the threshold, filtered by registered capacity to meet the requirements of 14.1b. The information is required to be published annually for the three following years.

4.21 Article 14.1c requires the publication of an estimate of the total scheduled generation (MW) for each settlement period for the following day. The information is required to be published no later than 18:00 Brussels time the day before. National Grid will publish the sum of PNs submitted by BMUs and include forecasts for smaller Wind, Solar, and Industrial Genertaion consistent with Article 6. Interconnector flows will not be included in the data.

4.22 Article 14.1d requires the publication of forecast wind and solar generation for each settlement period for the following day. The information is required to be published, like 14.1c, no later than 18:00 Brussels time. The information required is essentially the Wind and Solar component of 14.1c.

Article 15

4.23 The Transparency Regulation requirements for Article 15 can be viewed using the link in Annex 2 of this document. Section 3.27 to 3.40 covers the requirements of Article 15.

Article 16

4.24 The Transparency Regulation requirements for Article 16 can be viewed using the link in Annex 2 of this document. Article 16 requires the reporting of information relating to Actual Generation.

4.25 Article 16.1a requires the publication of actual generation output for a generation unit >=100MW. The information is required to be published five days after the settlement period although the draft form of the MEMIT implementing acts states the information under 16.1a shall be made available to ACER no later than the following working day.

4.26 Article 16.1b requires the publication of aggregated generation output for each settlement period by production type. The information is required in real-time and is to be published no later than one hour after the relevant settlement period. National Grid will publish aggregated generation output data for BMUs with operational metering.

4.27 Article 16.1c requires the publication of actual or estimated wind and solar generation for each settlement period. Like 16.1b the information is required in real-time, to be published no later than one hour after the settlement period. The values supplied can be updated with measured values as they become available. National Grid will publish metered information were possible and estimates if not available.

4.28 Article 16.1d is not relevant to GB as the Hydro threshold for reporting is not met.

Article 17

4.29 The Transparency Regulation requirements for Article 17 can be viewed using the link in Annex 2 of this document. Article 17 requires the reporting of a wide range of information relating to Balancing.

Q11. Do you have any comments on section 4?
You can give your views using the form in Annex 1

5 How to respond to this document

5.1 Please submit response to the questions listed in Annex 1 and any other comments or feedback to balancingservices@nationalgrid.com no later than the 18th December 2013.

5.2 Should you wish to discuss any part of this document, please contact Tariq Hakeem on 01926 655 439 or via email at tariq.hakeem@nationalgrid.com.

5.3 The questions have been summarised in Annex 1, a word version of the Annex has been published alongside this document.

Annex 1 – Summary of questions

National Grid invites responses to this consultation by **18th December 2013**. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following proforma.

Please return the completed proforma to balancingservices@nationalgrid.com

Q. No	Question	Response
1	**Q1. Do you have any comments on sections 3.1 to 3.5 including the utilisation of TOGA versus a new specific transparency interface?**	
2	**Q2. Do you have any comments on the workshop view discussed in section 3.7, that changes to existing EDL/EDT may be difficult to achieve for the option listed in the bullet point 1 of 3.3?**	
3	**Q3. Do you have any comments on the workshop view in relation to the EDL*/EDT* option discussed in 3.7 and in the bullet point 2 of 3.3?**	
4	**Q4. What is your preference of the options listed under 3.3?**	
5	**Q5. Do you have any other comments on potential data receipt option?**	
6	**Q6. Do you have any comments on the section titled Article 7 data requirements?**	
7	**Q7. Do you have any comments on the section titled Article 10.1c data requirements?**	

Q. No	Question	Response
8	**Q8. Do you have any comments on the section titled Article 14.1a data requirements?**	
9	**Q9. Does your company intend to submit REMIT data via National Grid for publication on Elexon's platform?**	
10	**Q10. Do you have any comments on the section titled Article 15 data requirements?**	
11	**Q11. Do you have any comments on section 4?**	

Annex 2 – Link to European Transparency Regulation

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF