

Report to the Authority

Grid Code and Distribution Code

European Transparency Regulation Implementation (GC0083)

This proposal seeks to modify the Grid Code and the Distribution Code to facilitate the collection of data required for compliance with European Commission Regulation (EU) No 543/2013

The purpose of this document is to assist the Authority in its decision of whether to implement the proposed Grid Code and Distribution Code Modifications.

Published on: 22 August 2014



National Grid recommends:

GC0083 should be implemented as it better facilitates Applicable Grid Code objectives (i), (ii), (iii) and (iv)



High Impact:

None identified



Medium Impact:

System Operator, Generators, Demand Customers



Low Impact:

None identified

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Any Questions?

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Proposer:

**National Grid
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About this document

This document is the Report to the Authority for GC0083 which contains the responses to the Industry Consultation and the National Grid and Distribution Network Licensees' recommendations. The purpose of this document is to assist the Authority in their decision of whether to implement the GC0083 proposed changes.

The revisions to the Grid and Distribution Codes as proposed and sent to the Authority require approval by that body and will, if approved, come into force on such date (or dates) of which Authorised Electricity Operators will be notified by National Grid and the Distribution Network Licensees, in accordance with the Authority's approval.

Document Control

| Version | Date | Author | Change Reference |
|---------|-----------|---------------|-------------------------------|
| 0.1 | 6/8/2014 | National Grid | Draft Report to the Authority |
| 1.0 | 22/8/2014 | National Grid | Final Report to the Authority |

1. Executive Summary

- 1.1. The European Commission Regulation No 543/2013¹ (also known as the Transparency Regulation) came into force on 4th July 2013. The Regulation sets out the minimum requirements for the publication of a common set of data relating to the generation, transportation and consumption of electricity.
- 1.2. Under this regulation, primary owners of data are required to submit information for publication on a central European transparency platform² managed by the European Network of Transmission System Operators for Electricity (ENTSO-E).
- 1.3. Twelve articles of the European Transparency Regulation (ETR) are related to data reporting requirements. Some of these will require primary data owners to submit supplementary information to National Grid in addition to the data they already submit under existing industry arrangements.
- 1.4. BSC Modification P295³ was raised to propose that Elexon is made the GB data provider for all the information that National Grid is required to submit to the ENTSO-E transparency platform. This was due to the interaction between ETR and REMIT⁴. BSC P295 was approved by the Authority on 22 January 2014 and the implementation date is set for 16 December 2014.
- 1.5. This modification proposal deals with the necessary changes to the Grid Code and to the Distribution Code to facilitate the collection of data to allow primary data owner's to discharge their obligations under ETR. Arrangements to deliver ETR must be implemented no later than 4 January 2015.

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

² <http://www.entsoe.net/#RS>

³ <http://www.elexon.co.uk/mod-proposal/p295/>

⁴ 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. Why Change?

- 2.1. The reason for this Grid Code amendment proposal is to facilitate the provision and collection of additional data items under the EU Transparency Regulation for which there is no existing GB Grid Code requirement.
- 2.2. The Transparency Regulation is a legally binding EU regulation that came into force on 4th July 2013. The aim of the regulation is to make available to market participants across Europe data that would allow them to take efficient production, consumption and trading decisions. It is also expected that the provision of timely information would allow TSOs to better control their networks and to operate in a more predictable and secure manner.
- 2.3. The Regulation places an obligation on primary owners of data to submit information related to generation, transportation and consumption of electricity to their TSO for publication on a Central European Transparency Platform run by ENTSO-E.
- 2.4. It also places an obligation on National Grid (in its role of GB TSO data provider) to facilitate the collection, verification and processing of data for onward publication to the Central European Transparency Platform.
- 2.5. Twelve articles of the European Transparency Regulation (ETR) are related to data reporting requirements. These articles are:
 - Article 6 - Information on total load
 - Article 7 - Information relating to the unavailability of consumption units
 - Article 8 - Year-ahead forecast margin
 - Article 9 - Transmission infrastructure
 - Article 10 - Information relating to the unavailability of transmission infrastructure
 - Article 11 - Information relating to the estimation and offer of cross zonal capacities
 - Article 12 - Information relating to the use of cross zonal capacities
 - Article 13 - Information relating to congestion management measures
 - Article 14 - Forecast generation
 - Article 15 - Information relating to the unavailability of generation and production units
 - Article 16 - Actual generation
 - Article 17 - Balancing
- 2.6. National Grid data submissions will cover the majority of these articles with the exception of Articles 11 and 12 for which the Interconnector Operators will submit data directly to the Transparency platform.
- 2.7. Elements of Article 17 relating to Imbalance data will be met by Elexon on behalf of National Grid.
- 2.8. To ascertain what the requirements would be for the remaining articles, National Grid conducted a feasibility and analysis study of its existing collection processes. An Industry workshop was held on 6 November 2013, to discuss data with Industry parties the requirements and the most efficient way of collection this data. This was followed by an Industry Consultation on the 5 December 2013 to obtain industry feedback on the

potential solutions and a corresponding follow-up report. There have also been three further Industry Workshops with another planned for September 2014. It was concluded that to fully comply with the remaining articles of the Regulation, primary owners of data will need to submit supplementary information for Articles 7, 14 and 15.

2.9. The data requirements for these articles are as follows:

Article 7 - Information relating to unavailability of consumption units

2.10. **Article 7** requires the reporting of planned and unplanned unavailability of demand units connected to both Transmission and Distribution Network Operator connected demand units.

2.11. This applies to planned unavailability of 100MW or more and any further changes of planned availability of 100MW or more for the same demand unit. In both cases, this applies to events lasting at least one settlement period (i.e. half an hour).

2.12. TSOs will need to report the changes aggregated by bidding zone. The bidding zone refers to the largest geographical area within which market participants are able to exchange energy without capacity allocation. This will be GB.

2.13. The data required for submission is as follows:

- Code of the demand unit (EIC code)
- Unavailable demand capacity in MW per half an hour during the event
- Reason for the unavailability (this could be maintenance, failure, shutdown or other)
- Start and estimated stop date (dd.mm.yy hh:mm) of the unavailability
- Remarks or additional information

2.14. Energy Identification Coding (EIC) is a coding scheme that has been developed, managed and maintained to facilitate cross-border exchanges and to efficiently and reliably identify different objects and parties relating to the European Internal Energy Market (IEM) and its operations. It is approved by ENTSO-E for the harmonisation and implementation of standardised electronic data interchanges and is therefore utilised for reporting to the Central European Transparency Platform.

2.15. Frequency of submission to the Transparency platform: Planned unavailability data of demand units is to be published as soon as possible but no later than 1 hour after the decision regarding the planned unavailability is made. Similarly, unplanned unavailability of demand units would need to be published as soon as possible but no later than 1 hour after the actual change in availability took place.

Article 14 - Forecast generation

2.16. **Article 14.1(a)** requires the publication of the sum of generation capacity of all existing Production units with installed capacity of 1 MW or more. The generation capacity refers to the installed net capacity as per January 1st of the following year. A Production unit is defined in the regulation as 'a facility for generation of electricity made up of a single generation unit or of an aggregation of generation units'. This is equivalent to the definition of a Power Station in GB.

2.17. Article 14.1(a) data will be aggregated by production type. The production type refers to fuel type as defined in the Manual of Procedures for the

ENTSO-E Central Information Transparency Platform⁵. A table with ENTSO-E production types and a GB equivalent as used in the Electricity Ten Year Statement can be found in Annex 2.

2.18. Frequency of submission to the Transparency platform: This Article requires data to be published annually no later than one week before the end of the year. Therefore the first formal publication will be in December 2015.

2.19. **Article 14.1(b)** requires the publication of information related to Production units (existing and planned) with an installed generating capacity of 100MW or more. The required data is as follows:

- Unit name
- Installed generation capacity (MW)
- Location
- Voltage connection level
- Bidding zone
- Production type

2.20. Frequency of submission to the Transparency platform: The information is required to be published annually for the three following years no later than one week before the first year to which the data refers. The information should refer to January 1st of each year for the following three years.

2.21. **Article 14.1(c)** requires the publication of an estimate of the total scheduled generation in MW for each settlement period for the following day.

2.22. Frequency of submission to the Transparency platform: The information is required to be published no later than 18:00 Brussels time the day before.

Article 15 - Information relating to the unavailability of generation and production units

2.23. **Article 15.1(a)** requires the reporting of the planned unavailability of 100 MW or more of a single Generation Unit. This applies to events expected to last at least one settlement period for up to three years ahead (i.e. on a rolling basis). The data required is as follows:

- Production unit name
- Generation unit name
- Location
- Bidding zone
- Installed capacity (MW)
- Production type
- Available capacity during the event
- Start date and estimated end date (dd.mm.yy hh:mm)
- Reason for the unavailability. This could be maintenance, outage, external factors or other.

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https://www.entsoe.eu/fileadmin/user_upload/library/resources/Transparency/131031_MoP_Master_for_ACER_opinion_v1.8.pdf

- 2.24. The regulation defines a Generation Unit as ‘a single electricity generator belonging to a production unit’. This is equivalent to the Grid code definition of a Generating Unit. Note that where applicable, OC2 submissions to TOGA and any data submitted in fulfillment of the Transparency Regulation should be consistent.
- 2.25. Frequency of submission to the Transparency platform: Similarly to Article 7, the information is required to be published as soon as possible but no later than one hour after the decision regarding the planned unavailability is made.
- 2.26. **Article 15.1(b)** requires the publication of information related to changes of 100MW or more in actual availability of a Generation Unit for events expected to last for at least one settlement period. The data requirements are:
- Production unit name
 - Generation unit name
 - Location
 - Bidding zone
 - Installed capacity (MW)
 - Production type
 - Available capacity during the event
 - Start date and end date (dd.mm.yy hh:mm)
 - Reason for the unavailability. This could be maintenance, outage, external factors or other.
- 2.27. Frequency of submission to the Transparency platform: Information is required to be published data as soon as possible but no later than one hour after the event has happened.
- 2.28. **Article 15.1(c)** requires the publication of planned unavailability data of a Production unit with a capacity of 200 MW or more. This includes changes of 100MW or more in the planned availability of the same production unit that are not published in accordance with article 15.1(a). This applies to events lasting at least one settlement period up to three years ahead. The data required is as follows:
- Production unit name
 - Location
 - Bidding zone
 - Installed capacity (MW)
 - Production type
 - Available capacity during the event
 - Start date and estimated end date (dd.mm.yy hh:mm)
 - Reason for the unavailability. This could be maintenance, outage, external factors or other.
- 2.29. Frequency of submission to the Transparency platform: Similarly to 15.1(a) the submission is required to be made as soon as possible but no later than one hour after the decision is made.
- 2.30. **Article 15.1(d)** relates to the publication of changes of 100MW or more in actual availability of a Production unit with a capacity of 200MW or more. This should include changes of 100MW or more in the planned unavailability of the same production unit that are not published in

accordance with article 15.1(b). This applies to all events lasting at least one settlement period. The data requirements are as follows:

- Production unit name
- Location
- Bidding zone
- Installed capacity (MW)
- Production type
- Available capacity during the event
- Start date and end date (dd.mm.yy hh:mm)
- Reason for the unavailability could be maintenance, outage, external factors or other.

2.31. Frequency of submission to the Transparency platform: Information is required to be published as soon as possible but no later than one hour after the event has happened.

3. Solution

- 3.1. In order to capture within the Grid Code the requirement for the submission of additional data items set out in this consultation, National Grid is proposing the following changes which are also set out in more detail below (in addition to minor changes to the Distribution Code):
- 2 new definitions within 'Glossary and Definitions';
 - two new paragraphs in the Operating Code as OC2.4.2.3 and OC2.4.7;
 - a new paragraph in the Planning Code as PC.A.3.4.3; and
 - additions to DRC Schedule 6.

Definitions

- 3.2. Two new definitions will be added to the 'Glossary and Definitions' section to define ETR Availability Data and MODIS. The proposed definitions are contained in Annex 1 of this industry consultation.
- 3.3. ETR Availability Data defines the new data that is required to be submitted solely under Articles 7 and 15 of the Transparency Regulation and the Market Operation Data Interface System (MODIS) is a new Software system currently being developed by National Grid, in collaboration with industry parties, to allow the capture of information for the purpose of ETR.

Article 7 and Article 15

- 3.4. To cater for Non Embedded Customers and generators, two new paragraphs (OC2.4.2.3 and OC2.4.7) will be added to the Operational Planning and Data Provision sections setting out what they are required to submit under Articles 7 and 15 respectively.
- 3.5. To cater for Embedded Customers it is proposed to make minor changes to the Distribution Code to remind affected customers that they have obligations under Article 7 of the Transparency Regulation to provide National Grid with the information they need to comply with their obligations. As there is a common driver for the changes, this consultation document includes the proposed changes to the Distribution Code as well as the Grid Code.
- 3.6. The proposed Grid Code legal text is contained in Annex 1 of this industry consultation.
- 3.7. The proposed Distribution Code legal text is contained in Annex 3 of this industry consultation.

Currently received Industry data that National Grid proposes to use in ETR submissions

Article 14

- 3.8. Article 14.1(a) and 14.1(b): Generators directly connected to the National Transmission System currently submit the necessary data to comply with this Article. This is in accordance with PC.A.3.2.2 of the Grid Code. The data forms part of the generator's submission in calendar Week 24 as

- specified in PC.4.3.1. As the data will be available in advance of when it is required, National Grid will not expect to change existing generator submission timescales.
- 3.9. For small scale generation however, National Grid currently does not receive the necessary information to comply with ETR. A joint proposal to modify the Distribution and Grid Code, GC0042 'Information on Small Embedded Power Stations and Impact on Demand', is being progressed through Industry Consultation to facilitate the collection of this data.
- 3.10. A new paragraph, PC.A.3.4.3, will be added to the Planning Code to allow the alignment of generator's fuel type to ETR production type. Generators will be required to include this information as part of their week 24 submission effective from week 24 2015. PC.A.3.4.3 would apply to Generators directly connected to the National Transmission System. The proposed legal text can be found in Annex 1 of this industry consultation.
- 3.11. Article 14.1(c) The proposal is to use the Physical Notification as a component for the total calculation of the total scheduled generation. Generators currently submit this data to National Grid as specified in BC1.4.2 at 11:00 hours each day for each Settlement Period of the next following Operational Day. This gives National Grid sufficient time to produce the necessary information to submit to the ENTSO platform. National Grid therefore, has decided not to alter current submission timescales.
- 3.12. In addition to the above changes, a new table will be added in DRC Schedule 6 – Users Outage Data. The table will contain:
- ETR article number;
 - Data description;
 - Name of the user providing data; and
 - Frequency of submission.
- 3.13. For clarity, the table will list the requirements (using GB terminology) of all the ETR articles where 3rd party data is required (existing and new) together with a reference to their associated Grid Code section. However, more detail of these requirements (based on the content of the Manual of Procedures documentation associated with Article 5 of the Transparency Regulation), as well as guidance on exactly how to submit the data to MODIS from an IS perspective, can be found in the ETR: NG – Market Interface Specification document attached as Annex 4 of this consultation.
- 3.14. The proposed Grid Code legal text can be found in Annex 1 of this consultation document.

Article 8

- 3.15. The proposal is to use **Output Usable** as a component for the calculation of the Year Ahead Forecast Margin. Generators currently submit this data to National Grid as specified in OC2.4.1.2.2.
- 3.16. Generators submit their **Output Usable** at different stages throughout the year giving National Grid sufficient time to produce the necessary reports. Therefore, no modification is required.

4. Impact & Assessment

Impact on the Grid Code

4.1. This proposal requires amendments to the following parts of the Grid Code:

- OC2.4.7, OC2.4.2.3 and PC.A.3.4.3
- Schedule 6 of the Data Registration Code

4.2. This proposal requires amendments to the following parts of the Distribution Code:

- DOC2.2 and DOC2.4

Impact on National Electricity Transmission System (NETS)

4.3. None identified

Impact on the Distribution Network Operators

4.4. None identified

Impact on Grid Code Users

4.5. The proposed changes to the Grid Code will increase the work required by Generating and Demand units to supply information to National Grid

Impact on Distribution Code Users

4.6. The proposed changes to the Distribution Code will increase the work required by Demand units connected to the Distribution Networks to supply information to National Grid

Impact on Greenhouse Gas emissions

4.7. None identified

Assessment against Grid Code Objectives

4.8. National Grid considers that GC0083 'European Transparency Regulation Implementation' would better facilitate the Grid Code objective:

- (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 reallocate 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 proposal has a neutral impact on this objective.

- (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 Generators, Demand and TSOs to discharge their obligations with regards to the European Transparency Regulation.

Assessment against Distribution Code Objectives

4.9. The proposal will better facilitate the Code objective to:

- (i) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity

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

- (ii) facilitate competition in the generation and supply of electricity

The proposal has a neutral impact on this objective.

- (iii) efficiently discharge the obligations imposed upon distribution licensees by the distribution licences and comply with the Regulation and any relevant legally binding decision of the European Commission and/or the Agency for the Co-operation of Energy Regulators.

The proposed changes would allow demand customers and TSOs to discharge their obligations with regards to the European Transparency Regulation.

Impact on core industry documents

4.10. The proposed modification does not impact on any core industry documents.

Impact on other industry documents

4.11. The proposed modification does not impact on any other industry documents.

Implementation

4.12. The GC0083 proposals should be implemented 10 business days after an Authority decision but no later than 4th January 2015. This is required to comply with European Legislation. For the avoidance of doubt, there is no requirement to submit information under the Transparency Regulation ahead of 4th January 2015.

5. Industry Consultation

5.1. An Industry Consultation was held ending on 21st July 2014. A total of 8 responses were received and an overview of these is given in the table below. Full copies of each of the responses are included in annex 5.

| Ref | Company | Supportive | Main Comments |
|------------------------------|------------------------|------------|--|
| Industry Consultation | | | |
| CR-01 | SSE | Yes | <ul style="list-style-type: none"> Supportive & no issues raised. |
| CR-02 | Northern Powergrid | Yes | <ul style="list-style-type: none"> One minor editorial change suggested. Pointed out that the proposed Grid Code (and Distribution Code) changes whilst not absolutely necessary given that the Transparency Regulations are European Law and GB implementation by clarifying the requirements and means of compliance. |
| CR-03 | RWE | Yes | <ul style="list-style-type: none"> A number of suggestions for clarification or minor editorial changes were made which have been incorporated in the revised legal text. Suggested that the time taken for Users to submit data in respect of an event be increased from 45 to 55 minutes with the National Grid component for onwards submission to the European Platform reduced from 15 to 5 minutes (maintaining compliance with the total 1 hour limit). |
| CR-04 | Drax Power | No | <ul style="list-style-type: none"> A number of areas for clarification identified including use of 'binding' in art for planned unavailability decisions and whether unavailability related to registered capacity or the value/output in the prior settlement period. On this basis unsupported. Followed up by phone conversation and email (included in annex 5) on the basis of which opinion changed to supportive. |
| CR-05 | Electricity North West | Yes | <ul style="list-style-type: none"> Supportive & no issues raised. |

| Ref | Company | Supportive | Main Comments |
|-------|--------------------------|------------|--|
| CR-06 | E.ON | Yes | <ul style="list-style-type: none"> Points out that although the Regulations apply directly, the Code changes are necessary to set out to users how to fulfil their responsibilities in a GB context. Proposes that the 45 minutes reporting timescales are unnecessarily onerous for what is anticipated to be an automated process. It is not explained in the consultation document why National Grid needs 15 minutes to forward on user data and a 5 minute margin of error should be sufficient therefore increasing the reporting timescales (within the total allowable window of 1 hour) to 55 minutes. Alternatively, less prescriptive drafting could be substituted stating that a user must provide the relevant information to National Grid to ensure that it is published within one hour of the user's decision on unavailability being made. As MODIS is the GB markets principal route of compliance with the requirements of the Transparency Regulation, proposes that National Grid should have an explicit obligation in the Grid Code to report on a monthly basis the percentage of time that the MODIS system is available for use by users. This would give industry visibility and in turn confidence in the robustness of the MODIS solution. |
| CR-07 | Scottish Power | Yes | <ul style="list-style-type: none"> Editorial changes pointed out to ensure that references match. Questions whether, given implementation in January 2015 but data submission through OC2 processes, whether this will mean a period of non-compliance. |
| CR-08 | TfL (London Underground) | Yes | <ul style="list-style-type: none"> Questions whether data submission will be in week 24 (as per OC2) or also in December. Asks whether the data as required from embedded generators will still be provided via DNO submissions as at present. |

National Grid Comments on Consultation Responses

- 5.2. National Grid would like to thank all of the respondents for their comments regarding GC0083 and their continued support.
- 5.3. With the initial exception of one respondent, the responses received were all supportive of the need for this Grid Code modification and understanding that while not strictly speaking necessary given that the Transparency Regulations are European Law, the provisions made aid GB implementation by clarifying the requirements and means of compliance.
- 5.4. Two respondents questioned the requirements for User data to be submitted within 45 minutes of an event, allowing a further 15 minutes for the data to be published to the platform and reflecting in the total time the requirement as in art 7.1 (a) et seq to publish data as soon as possible, but no later than one hour after the decision regarding the planned unavailability is made. On reflection this was felt to be over-prescriptive and the words proposed in schedule 6 were amended to indicate that the total allowable time to publication of data on the central platform is 1 hour.
- 5.5. A number of parties questioned whether there would be changes to the OC2 process, and specifically:
 - (i) Regarding the timing of submissions, whether there would be a mechanism for making changes to data between OC2 dates, whether the annual submission changes would mean a period of non-compliance following January 2015, and whether submission would remain as in OC2 or move to December.

Art 14.2 states that year ahead data should be published annually and no later than one week before the end of the year, while data for the three following years should be published annually no later than one week before the beginning of the first year to which the data relates. No change to OC2 in this respect is required and there will be no period of non-compliance in maintaining OC2 submission timescales in 2015.

- (ii) Whether the specified “data description” items in article 14 are to be provided in addition to that data currently provided as part of the week 24 OC2 submission by Users (e.g. Users do not routinely re-submit “Location of Generating Unit” and/or “Production type” and/or “Voltage connection levels” at week 24.)

These items would be part of the reference data in MODIS and could be changed in that if necessary. The details of the data required for submission are set out in the interface document to which a link is provided in annex 4 to this report. Energy Identification (EIC) Codes as defined by ENTSO-E (<https://www.entsoe.eu/data/energy-identification-codes-eic/Pages/default.aspx>) are also required but are not a substitute for submission of detailed data. The footnote to schedule 6 regarding EIC responsibilities has been amended to clarify that NGET will act as the Local Issuing Office for IEC in respect of GB.

- (iii) Given the granularity of data, how any ramping would be represented.

The lowest value of output anticipated in a settlement period should be submitted.

- 5.6. The definition of a ‘binding decision’ for planned unavailability was questioned by one respondent. It is acknowledged that generator outages will continue to change after submission; on this basis and since ‘binding’ is not defined and does not add to the meaning this word was removed.
- 5.7. What ‘base’ availability value changes in availability should be measured against was questioned. For example, should a change in availability of

≥100MW in settlement period x be with reference to the availability in the preceding settlement period or the rated capacity of the unit? The amended OC.2.4.7 (c) and (e) state reportable unavailability as being 100MW or more below the Registered Capacity of the unit or station respectively; OC2.4.7 (d) and (f) state that it is reportable if there is a change of 100MW or more in the MEL. Registered Capacity obviously is a constant; going back to the words in the regulation which state (art15.1 (b) and (d)) 'changes of 100 MW or more in actual availability' the change in MEL would be with reference to its previous value.

- 5.8. Guidance was requested on what Production Type (as defined in the Manual of Procedures) should be used for co-fired units, and also, if a unit converted fuel type whether its Production Type could be amended. Given that the Production types are as defined by ENTSO-E they cannot be amended in this Grid Code modification proposal; other European parties have had similar questions here though and it is possible that ENTSO-E will look at this again. In the meantime, generators should be characterized by the most appropriate type, which if firing on 90% biomass will be biomass. If converting, the Production Type should be amended in the generator's MODIS reference data.
- 5.9. Clarification was also requested on the Production Type by comparison to the list used in the recent GC0042 Information on Embedded Small Power Stations modification and why these were not the same. In GC0042 the Technology Type where required from Users is taken from a list set out at paragraph 2.23 in Version 2 of the Regulatory Instructions and Guidance relating to the distributed generation incentive, innovation funding incentive and registered power zones, reference 83/07, published by Ofgem in April 2007. However, GC0042 also sets out that the ENTSO-E Production Type should be quoted for all new connections on or after 1st January 2015 and can be used voluntarily now.
- 5.10. One party noted that since MODIS is the GB markets principal route of compliance with the requirements of the Transparency Regulation, National Grid in their opinion should have an explicit obligation in the Grid Code to report on a monthly basis the percentage of time that the MODIS system was available for use by users to give industry visibility and in turn confidence in the robustness of the MODIS solution. National Grid would be willing to provide this information but would suggest that rather than being specified in the Grid Code it would be more appropriate to take this forward through the Operational Forum.
- 5.11. Finally, one party asked whether the data as required from embedded generators will still be provided via DNO submissions as at present, which it will since for those embedded generators that do not have a contractual relationship with National Grid and are therefore not bound by the Grid Code this is the only available mechanism.

Annex 1 - Proposed Grid Code Legal Text

This section contains the proposed legal text to give effect to the proposals. The proposed new text is in red and is based on Grid Code Issue 5 Revision 7.

Note that where referenced below, 'Output Usable' OC2 submissions to TOGA and the Availability submissions to MODIS should be consistent, albeit MODIS submissions take place over faster timescales.

Changes to the Grid Code: Glossary and Definitions

Market Operation Data Interface System (MODIS)

A computer system operated by **NGET** and made available for use by **Customers** connected to or using the **National Electricity Transmission System** for the purpose of submitting **EU Transparency Availability Data** to **NGET**.

EU Transparency

Availability Data

Such data as Customers and Generators are required to provide under Articles 7.1(a) and 7.1(b) and Articles 15.1(a), 15.1(b), 15.1(c), 15.1(d) of European Commission Regulation (EU) No. 543/2013 respectively (known as the Transparency Regulation), and which also forms part of **DRC** Schedule 6 (Users' Outage Data).

Changes to the Grid Code: Operational Code

OC2.4.2 DATA REQUIREMENTS

....

OC2.4.2.3 Under European Commission Regulation No. 543/2013, **Users** are required to submit certain data for publication on the Central European Transparency Platform managed by the European Network of Transmission System Operators for Electricity (ENTSO-E). **NGET** is required to facilitate the collection, verification and processing of data from **Users** for onward transmission to the Central European Transparency Platform.

Each **Generator** and each **Non-Embedded Customer** connected to or using the **National Electricity Transmission System** shall provide **NGET** with such information as required by and set out in **DRC** Schedule 6 (Users' Outage Data **EU Transparency Availability Data**) in the timescales detailed therein.....

OC.2.4.7 In the event that:

- a) a **Non-Embedded Customer** experiences the planned unavailability of its **Apparatus** resulting in the reduction of Demand of 100MW or more, or a change to the planned unavailability of its Apparatus resulting in a change in Demand of 100MW or more, for one Settlement Period or longer; or
- b) a **Non-Embedded Customer** experiences a change in the actual availability of its **Apparatus** resulting in a change in Demand of 100MW or greater; or
- c) a **Generator** experiences a planned unavailability of a **Generating Unit** resulting in a change of 100MW or more in the **Output Usable** of that **Generating Unit** below its previously

notified availability, which is expected to last one **Settlement Period** or longer and up to three years ahead; or

- d) a **Generator** experiences a change of 100MW or more in the Maximum Export Limit of a **Generating Unit** which is expected to last one **Settlement Period** or longer; or
- e) a **Generator** experiences a planned unavailability resulting in a change of 100MW or more in its aggregated **Output Usable** below its previously notified availability for a **Power Station** with a **Registered Capacity** of 200MW or more and which is expected to last one **Settlement Period** or longer and up to three years ahead, save where data has been provided pursuant to OC.2.4.7(c) above; or
- f) a **Generator** experiences a change of 100MW or more in the aggregated Maximum Export Limit of a **Power Station** with a **Registered Capacity** of 200MW or more, which is expected to last one **Settlement Period** or longer, save where data has been provided pursuant to OC.2.4.7(d) above;

such **Non-Embedded Customer** or **Generator** shall provide **NGET** with the **EU Transparency Availability Data** in accordance with **DRC** Schedule 6 (Users' Outage Data) using **MODIS** and, with reference to points OC2.4.7 (a) to (f), EU Transparency Regulation articles 7.1(a), 7.1(b), 15.1(a), 15.1.(b), 15.1(c) and 15.1(d) respectively.

PART 1 - STANDARD PLANNING DATA

PC.A.3.4 General Generating Unit Power Park Module and DC Converter Data

....

PC.A.3.4.3 Each **Generator** shall supply **NGET** with the production type(s) used as the primary source of power in respect of each **Generating Unit**, selected from the list set out below:

- Biomass
- Fossil brown coal/lignite
- Fossil coal-derived gas
- Fossil gas
- Fossil hard coal
- Fossil oil
- Fossil oil shale
- Fossil peat
- Geothermal
- Hydro pumped storage
- Hydro run-of-river and poundage
- Hydro water reservoir
- Marine
- Nuclear
- Other renewable
- Solar
- Waste
- Wind offshore
- Wind onshore
- Other

Schedule 6 – USERS OUTAGE INFORMATION
PAGE 2 OF 2

The data below is to be provided to **NGET** as required for compliance with the European Commission Regulation No 543/2013 (OC2.4.2.3). Data provided under Article Numbers 7.1(a), 7.1(b), 15.1(a), 15.1(b), and 15.1(c) and 15.1(d) is to be provided using **MODIS**.

| ECR ARTICLE No. | DATA DESCRIPTION | USERS PROVIDING DATA | FREQUENCY OF SUBMISSION |
|-----------------|---|------------------------------|---|
| 7.1(a) | <p>Planned unavailability of the Apparatus belonging to a Non-Embedded Customer where OC2.4.7 (a) applies</p> <ul style="list-style-type: none"> - Energy Identification Code (EIC)* - Unavailable demand capacity during the event (MW) - Estimated start date and time (dd.mm.yy hh:mm) - Estimated end date and time (dd.mm.yy hh:mm) - Reason for unavailability from the list below: <ul style="list-style-type: none"> . Maintenance . Failure . Shutdown . Other | Non-Embedded Customer | To be received by NGET as soon as reasonably possible but in any case to facilitate publication of data no later than 1 hour after a decision has been made by the Non-Embedded Customer regarding the planned unavailability |
| 7.1(b) | <p>Changes in actual availability of the Apparatus belonging to a Non-Embedded Customer where OC2.4.7 (b) applies</p> <ul style="list-style-type: none"> - Energy Identification Code (EIC)* - Unavailable demand capacity during the event (MW) - Start date and time (dd.mm.yy hh:mm) - Estimated end date and time (dd.mm.yy hh:mm) - Reason for unavailability from the list below : <ul style="list-style-type: none"> . Maintenance . Failure . Shutdown . Other | Non-Embedded Customer | To be received by NGET as soon as reasonably possible but in any case to facilitate publication of data no later than 1 hour after the change in actual availability |
| 8.1 | <p>Year Ahead Forecast Margin information as provided in accordance with OC2.4.1.2.2</p> <ul style="list-style-type: none"> - Output Usable | Generator | In accordance with OC2.4.1.2.2 |
| 14.1(a) | <p>Registered Capacity for Generating Units with greater than 1 MW Registered Capacity provided in accordance with PC.4.3.1 and PC.A.3.4.3 or PC.A.3.1.4</p> <ul style="list-style-type: none"> - Registered Capacity (MW) - Production type (from that listed under PC.A.3.4.3) | Generator | Week 24 |
| 14.1(b) | <p>Power Station Registered Capacity for units with equal or greater than 100 MW Registered Capacity provided in accordance with PC.4.3.1 and PC.A.3.4.3</p> <ul style="list-style-type: none"> - Power Station name - Location of Generating Unit - Production type (from that listed under PC.A.3.4.3) - Voltage connection levels - Registered Capacity (MW) | Generator | Week 24 |
| 14.1(c) | <p>Estimated output of Active Power of a BM Unit or Generating Unit for each per Settlement Period of the next Operational Day provided in accordance with BC1.4.2</p> <ul style="list-style-type: none"> - Physical Notification | Generator | In accordance with BC1.4.2 |

| | | | |
|---------|--|------------------|---|
| 15.1(a) | Planned unavailability of a Generating Unit where OC2.4.7(c) applies <ul style="list-style-type: none"> - Power Station name - Generating Unit name - Location of Generating Unit - Generating Unit Registered Capacity (MW) - Production type (from that listed under PC.A.3.4.3) - Output Usable (MW) during the event - Start date and time (dd.mm.yy hh:mm) - Estimated end date and time (dd.mm.yy hh:mm) - Reason for unavailability from the list below: <ul style="list-style-type: none"> . Maintenance . Shutdown . Other | Generator | To be received by NGET as soon as reasonably possible but in any case to facilitate publication of data no later than 1 hour after a decision has been made by the Generator regarding the planned unavailability |
| 15.1(b) | Changes in availability of a Generating Unit where OC2.4.7 (d) applies <ul style="list-style-type: none"> - Power Station name - Generating Unit name - Location of Generating Unit - Generating Unit Registered Capacity (MW) - Production type (from that listed under PC.A.3.4.3) - Maximum Export Limit (MW) during the event - Start date and time (dd.mm.yy hh:mm) - Estimated end date and time (dd.mm.yy hh:mm) - Reason for unavailability from the list below: <ul style="list-style-type: none"> . Maintenance . Shutdown . Other | Generator | To be received by NGET as soon as reasonably possible but in any case to facilitate publication of data no later than 1 hour after the change in actual availability |
| 15.1(c) | Planned unavailability of a Power Station where OC2.4.7(e) applies <ul style="list-style-type: none"> - Power Station name - Location of Power Station - Power Station Registered Capacity (MW) - Production type (from that listed under PC.A.3.4.3) - Power Station aggregated Output Usable (MW) during the event - Start date and time (dd.mm.yy hh:mm) - Estimated end date and time (dd.mm.yy hh:mm) - Reason for unavailability from the list below: <ul style="list-style-type: none"> . Maintenance . Shutdown . Other | Generator | To be received by NGET as soon as reasonably possible but in any case to facilitate publication of data no later than 1 hour after a decision has been made by the Generator regarding the planned unavailability |
| 15.1(d) | Changes in actual availability of a Power Station where OC2.4.7 (f) applies <ul style="list-style-type: none"> - Power Station name - Location of Power Station - Power Station Registered Capacity (MW) - Production type (from that listed under PC.A.3.4.3) - Power Station aggregated Maximum Export Limit (MW) during the event - Start date and time (dd.mm.yy hh:mm) - Estimated end date and time (dd.mm.yy hh:mm) - Reason for unavailability from the list below: <ul style="list-style-type: none"> . Maintenance . Shutdown . Other | Generator | To be received by NGET as soon as reasonably possible but in any case to facilitate publication of data no later than 1 hour after the change in actual availability |

* Energy Identification Coding (EIC) is a coding scheme that is approved by ENTSO-E for standardised electronic data interchanges and is utilised for reporting to the Central European Transparency Platform. NGET will act as the Local Issuing Office for IEC in respect of GB.

Annex 2 – ENTSO-E Production types

ENTSO-E production types and a GB equivalent (as used in the Electricity Ten Year Statement) are as follows:

| Type Number | ENTSO-E description | NG Code | NG Title |
|-------------|---------------------------------|------------|---|
| 1 | Biomass | OTHER | Undefined |
| 2 | Fossil Brown coal/Lignite | COAL | Coal Plant |
| 3 | Fossil Coal-derived gas | CCGT/ OCGT | Combined Cycle Gas Turbine/ Open Cycle Gas Turbine Plan |
| 4 | Fossil Gas | CCGT/ OCGT | Combined Cycle Gas Turbine/ Open Cycle Gas Turbine Plan |
| 5 | Fossil Hard coal | COAL | Coal Plant |
| 6 | Fossil Oil | OIL | Oil Plant |
| 7 | Fossil Oil shale | OIL | Oil Plant |
| 8 | Fossil Peat | COAL | Coal Plant |
| 9 | Geothermal | OTHER | Undefined |
| 10 | Hydro Pumped Storage | PS | Pumped Storage Plant |
| 11 | Hydro Run-of-river and poundage | NPSHYD | Non Pumped Storage Hydro Plant |
| 12 | Hydro Water Reservoir | NPSHYD | Non Pumped Storage Hydro Plant |
| 13 | Marine | OTHER | Undefined |
| 14 | Nuclear | NUCLEAR | Nuclear Plant |
| 15 | Other renewable | OTHER | Undefined |
| 16 | Solar | OTHER | Undefined |
| 17 | Waste | OTHER | Undefined |
| 18 | Wind Offshore | WIND | Power Park Modules metered by the Transmission Operator |
| 19 | Wind Onshore | WIND | Power Park Modules metered by the Transmission Operator |
| 20 | Other | OTHER | Undefined |

Annex 3 – Proposed Distribution Code Legal Text

This section contains the proposed legal text to give effect to the proposals. The proposed new text is in red and is based on Distribution Code Issue 21.

DOC2.2 Objectives

The objectives of this **Distribution Operating Code** are:

- (a) To set out the **DNO's Operational Planning** procedure and a typical timetable for the co-ordination of outage requirements of **Plant** and **Apparatus** to be provided by **Users** to enable the **DNO** to operate the DNO's Distribution System.
- (b) To specify the information to be provided by **Users** to the **DNO** to enable the **DNO** to comply with its obligations under the **Grid Code**.
- (c) To provide guidance for **High Voltage Customers** on how to comply with their obligations under Article 7 of the European Transparency Regulations (The European Commission Regulation No 543/2013) to provide information to **NGC** in their role as Transmission System Operator.

DOC2.4 Information Flow and Co-ordination

DOC2.4.1 Embedded Generators

Information relating to **Embedded Generating Plant** where the **DNO** reasonably considers it appropriate whose **Registered Capacity** is greater than 5MW, or 1MW in the case of renewable generating plant in Scotland and **Embedded Transmission System** shall where reasonably required by the **DNO** be provided by the **User** directly to the **DNO**. This may include a **Customer With Own Generation** where the **DNO** considers it appropriate.

DOC2.4.2 High Voltage Customers

In the event that:

- a) a **High Voltage Customer** experiences the planned unavailability of its **Apparatus** resulting in the reduction of **Demand** of 100MW or more, or a change to the planned unavailability of its **Apparatus** resulting in a change in **Demand** of 100MW or more, for one settlement period or longer; or
- b) a **High Voltage Customer** experiences a change in the actual availability of its **Apparatus** resulting in a change in **Demand** of 100MW or greater,

such a **High Voltage Customer** shall provide **NGC** with the information required from a Non-Embedded Customer specified in

Grid Code OC2.4.2.3 and Grid Code DRC Schedule 6 in a format and timescales agreed with NGC.

DOC2.4.3 Other Plant and Apparatus

Information relating to all Plant and Apparatus connected to the DNO's Distribution System, or that which may affect its Operation, shall be co-ordinated with the DNO.

Annex 4 – ETR: NG – Market Interface Specification

The following document specifies the interface details and report specification required for the ETR project, and provides a detailed breakdown of the data required to build reports to be exchanged between Market Participant and National Grid.

<http://www2.nationalgrid.com/UK/Industry-information/Europe/ETR-E-Modis/>

CR-01 SSE

Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 **21 July** 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

| | |
|---|--|
| Respondent: | Steve Davidson steve.davidson@sse.com |
| Company Name: | SSE |
| Do you support the proposed implementation approach? | Yes |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | Yes |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | Yes |
| Does the proposed Grid Code drafting implement the intended changes effectively? | Yes |
| Does the proposed Distribution Code drafting implement the intended changes effectively? | Yes |
| Do you believe that the proposal better facilitates the Grid Code objectives? | Yes |
| Do you believe that the proposal better facilitates Distribution Code objectives? | Yes |
| Do you support the proposed implementation approach? | Yes |
| Do you believe that the proposed timescales are appropriate? | Yes |
| Do you have any additional comments? | No |

Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 **21 July** 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

| | |
|--|---|
| Respondent: | <i>Alan Creighton alan.creighton@northernpowergrid.com</i> |
| Company Name: | <i>Northern Powergrid</i> |
| Do you support the proposed implementation approach? | <i>Yes</i> |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | <p><i>Yes, for the reasons set out in the consultation document</i></p> <p><i>For reference the applicable Grid Code objectives are:</i></p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p><i>(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);</i></p> <p><i>(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</i></p> <p><i>(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</i></p> |

| | |
|---|--|
| | <i>Commission and/or the Agency to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i> |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | <i>The proposed Grid Code (and Distribution Code) changes whilst not absolutely necessary given that the Transparency Regulations are European Law, they aid their implementation in GB by adding clarifying the requirements and means of compliance.</i> |
| Does the proposed Grid Code drafting implement the intended changes effectively? | <i>Yes</i> |
| Does the proposed Distribution Code drafting implement the intended changes effectively? | <i>Yes</i> |
| Do you believe that the proposal better facilitates the Grid Code objectives? | <i>Yes, for the reasons set out in the consultation document</i> |
| Do you believe that the proposal better facilitates Distribution Code objectives? | <i>Yes, for the reasons set out in the consultation document</i> |
| Do you support the proposed implementation approach? | <i>Yes</i> |
| Do you believe that the proposed timescales are appropriate? | <i>Northern Powergrid will not be affected by these particular articles of the Transparency regulations, and hence don't have any particular view in the implementation timescales, other than agreeing that arrangements should be in place to ensure GB complies with the regulations when they come into force.</i> |
| Do you have any additional comments? | <i>We have just one editorial comment on the Distribution Code drafting: DOC2.4.2. Unlike in the Grid Code, 'Settlement Period' is not a defined term in the Distribution Code, and should not be in bold text.</i> |

Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 **21 July** 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

| | |
|--|--|
| Respondent: | John Norbury Network Connections Manager RWE Supply & Trading GmbH Windmill Hill Business Park Whitehill Way Swindon SN5 6PB T +44 (0)1793 89 2667 M +44 (0)7795 354 382 john.norbury@rwe.com |
| Company Name: | RWE Group of GB companies, including RWE Generation UK plc, RWE Innogy UK Limited and RWE Supply & Trading GmbH. |
| Do you support the proposed implementation approach? | We agree with the proposed implementation date of 4 th January 2015. |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | Yes for the reasons given in the Consultation Paper. <i>For reference the applicable Grid Code objectives are:</i> <i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i> <i>(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);</i> <i>(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 are taken as a whole; and</i> |

| | |
|---|---|
| | <i>(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, to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i> |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | We consider that the central collection of User's data within GB will improve efficiency and consistency in fulfilling the requirements of European Law and agree that the Grid Code would be the appropriate code to define this requirement. |
| Does the proposed Grid Code drafting implement the intended changes effectively? | We are satisfied that the proposed Grid Code drafting, subject to the comments made below, implements the intended changes effectively. |
| Does the proposed Distribution Code drafting implement the intended changes effectively? | We are satisfied that the proposed Distribution Code drafting implement the intended changes effectively. |
| Do you believe that the proposal better facilitates the Grid Code objectives? | Yes for the reasons given in the Consultation Paper. |
| Do you believe that the proposal better facilitates Distribution Code objectives? | Yes for the reasons given in the Consultation Paper. |
| Do you support the proposed implementation approach? | We agree with the proposed implementation date of 4th January 2015. |
| Do you believe that the proposed timescales are appropriate? | It is not clear what timescales are being referred to. (see reply above and also 2 nd bullet comment under 15.1 (a to d) below. |
| Do you have any additional comments? | <p><u>Comments on OC2.4.7</u> OC2.4.7(c) and OC2.4.7(d) Delete "below its Registered Capacity" – we feel strongly that this reference is confusing, unnecessary and could be interpreted to require a notification to be submitted for any small change in OU following a previous reduction of 100MW or more. Alternatively, it is suggested that "Registered Capacity" be substituted with "previously notified availability".</p> <p><u>Comments on PC.A.3.4.3</u> It is suggested that consideration be given to integrating the list of production types with a similar list of production types proposed for PC.A.3.1.4 (a) (ii)</p> |

under G00042.

Comments on Schedule 6

14.1(a) & 14.1(b)

- Delete "Annual" – meaning less with respect to Registered Capacity.
- Delete reference to P.C.A.2.2.8 (does not exist) or substitute with P.C.A.3.4.3 as appropriate.
- Clarify whether the specified "data description" items are to be provided in addition to that data currently provided as part of the week 24 submission by Users (e.g. Users do not routinely re-submit "Location of Generating Unit" and/or "Production type" and/or "Voltage connection levels" at week 24.)

14.1(a)

- After "Production type" insert: "from that listed under P.C.A. 3.4.3"

14.1.(c)

- Amend: "...of the next following ~~day~~ Operational Day ..."

15.1(a to d)

- Clarify whether an IEC code is required in respect of these submissions. If an IEC code is required, we assume that other items such as Generating Unit name and location would not be required and should therefore be deleted from the text.
- For 15.1(a to c) substitute P.C.A.2.2.8 with P.C.A.3.4.3 and for 15.1(d) after "Production type" insert: "from that listed under P.C.A. 3.4.3"
- It is assumed that National Grid would forward User's data automatically to the European Platform and, on this basis and in order to give Users sufficient time to prepare and submit their data, it is requested that the specified "45min" duration be increased to "55min".

Footnote: For clarity Insert "NGET will act as Local Issuing Office for IEC in respect of GB".

Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 21 July 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

| | |
|--|---|
| Respondent: | Cem Suleyman (cem.suleyman@drax.com) |
| Company Name: | Drax Power Limited |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | <p>No. Specifically for Grid Code Objectives (i), (ii) and (iv), the development of suitable IS systems by National Grid, rather than GC0083, will facilitate the efficient collection and publication of the required information, which then may lead to the desirable effects described in National Grid's assessment.</p> <p>Ultimately, the Transparency Regulation is binding on Primary Owners of data. Therefore, as long as suitable IS systems are developed by National Grid to allow Primary Owners of data to submit their information, this data will be forthcoming to National Grid in a timely and efficient manner.</p> <p>The changes to the Grid Code proposed, as currently drafted, create material risks that Primary Owners of data will be unable to comply with the Grid Code. In the event that the proposals are implemented, clarity is needed on a number of issues to ensure that obligated parties can comply with the requirements. These include:</p> <ul style="list-style-type: none"> • What does a 'binding decision' mean with regards to submitting planned unavailability data? Is it equivalent to the Precision Test under REMIT? Without clarity on this point it is difficult for Primary Owners of data to provide the required information on planned unavailability • What 'base' availability value should changes in availability be measured against? For example, should a change in availability of $\geq 100\text{MW}$ in settlement period x be with reference to the availability in the preceding settlement period or |

| | |
|--|---|
| | <p>the rated capacity of the unit?</p> <ul style="list-style-type: none"> • We note that Production Types have been defined in the Manual of Procedures. However, some guidance is required on how enhanced biomass co-fired units should be characterised. Also, where a coal unit converts to biomass will there be the opportunity to amend the data in a timely manner? • For the collection of data relevant to Article 14 'Forecast Generation', we note that National Grid intends to collect this data at Week 24. However, what happens if data provided by individual Primary Owners of data changes between Week 24 and the end of year i.e. December? Will there be the means to update the data submission? <p>The lack of clarity on the above points could lead to inconsistency of data submission on different information platforms. These include:</p> <ul style="list-style-type: none"> • Inconsistent availability data submissions on company REMIT webpages, EMFIP and the BMR S Website (P291 solution) • Potential planned availability data inconsistency beyond 52 weeks. We do not currently report data beyond 52 weeks as we do not consider that information available to us is 'precise' at this point. However, the Transparency Regulation requires Primary Owners of data to provide planned availability data up to 3 years ahead. Clarity on what basis Primary Owners of data are to submit this information is required to ensure accurate and consistent submissions • There is also the potential for data inconsistency for planned availability submissions within year. Data provided under DC2 (2-52 week) is in weekly format whereas the Transparency Regulation requires data by settlement period. DC2 data won't capture the ramp up and down in availability within week. As such we agree with the statement in the consultation document that DC2 submissions should be consistent with Transparency Regulation submissions. However, it is unclear whether the design of IS systems will facilitate consistent data submission. |
|--|---|

| | |
|---|---|
| <p>Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law?</p> | <p>No for the reasons provided above.</p> |
| <p>Does the proposed Grid Code drafting implement the intended changes effectively?</p> <p>Does the proposed Distribution Code drafting implement the intended changes effectively?</p> | <p>For the reasons given above we do not believe the proposed Grid Code drafting implements the intended changes effectively. We have no comment on the Distribution Code changes.</p> |
| <p>Do you believe that the proposal better facilitates Distribution Code objectives?</p> | <p>n/a.</p> |
| <p>Do you support the proposed implementation approach?</p> | <p>Yes.</p> |
| <p>Do you believe that the proposed timescales are appropriate?</p> | <p>Yes.</p> |
| <p>Do you have any additional comments?</p> | <p>It should be noted that the Transparency Regulation data requirements will likely require the amendment of obligated parties' internal REMIT reporting procedures, particularly for planned availability submissions. For example, the 45 minute deadline to send submissions to National Grid, as proposed in the legal text, will require changes to internal processes (where one hour is currently allowed).</p> |

From: Cem Suleyman [mailto:Cem.Suleyman@drax.com]
Sent: 01 August 2014 08:47
To: Wilson, Robert - UK
Cc: Haffner, Alex
Subject: RE: Response on GC0083

That's fine Rob.

Cheers,

Cem

From: Wilson, Robert - UK [mailto:Robert.Wilson2@nationalgrid.com]
Sent: 31 July 2014 17:00
To: Cem Suleyman
Cc: Haffner, Alex
Subject: RE: Response on GC0083

Cem,
Good to talk to you this morning. For completeness and as discussed here are our replies to your consultation response:

What does a 'binding decision' mean with regards to submitting planned unavailability data? Is it equivalent to the Preciseness Test under REMIT? Without clarity on this point it is difficult for Primary Owners of data to provide the required information on planned unavailability.

In the Transparency GC mod consultation the legal text makes reference to data 'To be received by NGET as soon as reasonably possible but no later than 45 minutes after a binding decision has been made by the Generator regarding the planned unavailability' [see p19, schedule 6 words for art 15.1 (a) & (c)]. The Transparency regs as referenced (art 15.2) read 'The information laid down in points (a) and (c) of paragraph 1 shall be published as soon as possible, but no later than one hour after the decision regarding the planned unavailability is made.' On this basis we would be happy to remove the word 'binding' which does not appear to add to the meaning. It is acknowledged that generator outages will continue to be subject to changes after any decision is made.

What 'base' availability value should changes in availability be measured against? For example, should a change in availability of $\geq 100\text{MW}$ in settlement period x be with reference to the availability in the preceding settlement period or the rated capacity of the unit?

The amended OC.2.4.7 (c) and (e) state reportable unavailability as being 100MW or more below the Registered Capacity of the unit or station respectively; OC2.4.7 (d) and (f) state that it is reportable if there is a change of 100MW or more in the MEL. Registered Capacity obviously will be a constant; going back to the words in the regulation which state (art15.1 (b) and (d)) 'changes of 100 MW or more in actual availability' the change in MEL would be with reference to its previous value.

We note that Production Types have been defined in the Manual of Procedures. However, some guidance is required on how enhanced biomass co-fired units should be

characterised. Also, where a coal unit converts to biomass will there be the opportunity to amend the data in a timely manner?

The Production types are as defined by ENTSO-E so cannot be amended in the Grid Code modification proposal; other parties have had similar questions here though and it is possible that ENTSO-E will look at this again. In the meantime, we think that you have to choose the most appropriate type, which if firing on 90% biomass will be biomass. If converting, the Production Type can be amended in your MODIS reference data.

For the collection of data relevant to Article 14 'Forecast Generation', we note that National Grid intends to collect this data at Week 24. However, what happens if data provided by individual Primary Owners of data changes between Week 24 and the end of year i.e. December? Will there be the means to update the data submission?

Articles 14.1 (a) and (b) in terms of forecast generation only require this to be published annually. It is therefore not necessary to change the OC2 requirements with regard to timings.

I hope this helps. Please get back to me if anything further is outstanding.

Regards,

Rob Wilson MSc CEng MIET

National Grid

01926 653398

07799 656402

robert.wilson2@nationalgrid.com

From: Cem Suleyman [<mailto:Cem.Suleyman@drax.com>]

Sent: 31 July 2014 14:13

To: Haffner, Alex; Wilson, Robert - UK

Subject: RE: Response on GC0083

Hi Alex and Rob,

Thanks again for providing your time to discuss the points made in our consultation response.

I've had a look at the Interface document and I'm happy that we'll be able to cope with the 'ramping' issue.

That just leaves the 'binding decision' issue. After discussing the issue internally, I think if you were to remove the word 'binding' from the legal text that would give us more comfort. I think this would result in leaving the interpretation of when a decision has been made up to the generator. Each generator can then interpret when a 'decision' has been taken as it sees fit (considering there is no guidance on this in the Transparency Regulation).

So on the basis that the word binding is removed from the legal text, we will be in a position to support the modification.

Happy to discuss.

Kind regards,

Cem

From: Haffner, Alex [<mailto:Alex.Haffner@nationalgrid.com>]
Sent: 30 July 2014 13:34
To: Cem Suleyman
Cc: Wilson, Robert - UK; Paul Noakes
Subject: RE: Response on GC0083

Thanks for the quick response Cem – I half expected you to be on holiday as most people seem to be at the moment!

Unfortunately, 10 is the only time I can't make tomorrow and it's probably best if both Rob and myself can participate. How are you and Paul fixed for the following times tomorrow instead?

9-10
11-12
15-17

Regards,

Alex

From: Cem Suleyman [<mailto:Cem.Suleyman@drax.com>]
Sent: 30 July 2014 13:25
To: Haffner, Alex
Cc: Wilson, Robert - UK
Subject: RE: Response on GC0083

Hi Alex,

Yes a call would be helpful if you're able to clarify some of the points made in our response, as well as answer any questions on the technical solution. Paul Noakes will join the call as well.

Are you available for a call at 10am tomorrow?

Best wishes,

Cem

From: Haffner, Alex [<mailto:Alex.Haffner@nationalgrid.com>]
Sent: 29 July 2014 16:56
To: Cem Suleyman
Cc: Wilson, Robert - UK
Subject: Response on GC0083

Hi Cem

I've had a look through your response to the consultation on GC0083 (Transparency) and wondered if I could give you a call to talk through it and see if I can allay any of your concerns. Do you have any availability this week at all?

Some of your concerns are quite specific but I wanted to discuss the general solution for Transparency including the new NGET system that has been developed for Transparency Reporting of the relevant articles where we don't already have the information. Have you been in touch with Nicola Garrett or Paul Noakes at all on this by the way?

Regards,

Alex

Alex Haffner

BSC Development Manager
Commercial Frameworks - Electricity
Transmission Network Service
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Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 **21 July** 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

| | |
|--|---|
| Respondent: | <i>Ian Povey TEL: 0161 604 1377, Email: ian.povey@enwl.co.uk</i> |
| Company Name: | <i>Electricity North West Limited</i> |
| Do you support the proposed implementation approach? | <i>Yes</i> |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | <p><i>For reference the applicable Grid Code objectives are:</i></p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p><i>(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);</i></p> <p><i>(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</i></p> <p><i>(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 to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> |

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| | Yes, it does better facilitate the appropriate Grid Code objectives. |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | Yes |
| Does the proposed Grid Code drafting implement the intended changes effectively? | Yes |
| Does the proposed Distribution Code drafting implement the intended changes effectively? | Yes |
| Do you believe that the proposal better facilitates the Grid Code objectives? | Yes |
| Do you believe that the proposal better facilitates Distribution Code objectives? | Yes |
| Do you support the proposed implementation approach? | Yes |
| Do you believe that the proposed timescales are appropriate? | Yes |
| Do you have any additional comments? | No. |

Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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| Respondent: | Guy Phillips (guy.phillips@eon-uk.com) |
| Company Name: | E.ON |
| Do you support the proposed Implementation approach? | Yes. |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | <p>For reference the applicable Grid Code objectives are:</p> <p>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</p> <p>(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);</p> <p>(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</p> <p>(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, to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</p> |

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| | <i>Specifically in relation to objective (iv) in order to facilitate compliance with the European Transparency Regulation.</i> |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | <i>Although the Regulations apply directly, the Code changes are necessary to set out to users how to fulfil their responsibilities in a GB context.</i> |
| Does the proposed Grid Code drafting implement the intended changes effectively? Does the proposed Distribution Code drafting implement the intended changes effectively? | <i>Broadly yes, although the 45 minutes reporting timescales are unnecessarily onerous for what we anticipate should be an automated process. It is not explained in the consultation document why National Grid needs 15 minutes to forward on user data. We would argue that a 5 minute margin of error should be sufficient and the reporting timescales should be increased to 55 minutes. Alternatively less prescriptive drafting could be substituted stating that a user must provide the relevant information to National Grid to ensure that it is published within one hour of the user's decision on unavailability being made.</i> |
| Do you believe that the proposal better facilitates the Grid Code objectives? Do you believe that the proposal better facilitates Distribution Code objectives? | <i>Yes, see answer to earlier question.</i> <i>Yes, in relation to objective (iii) in order to facilitate compliance with the European Transparency Regulation.</i> |
| Do you support the proposed implementation approach? | <i>Yes.</i> |
| Do you believe that the proposed timescales are appropriate? | <i>No, as above, the 45 minutes reporting timescales are unnecessarily onerous for what we anticipate should be an automated process. It is not explained in the consultation document why National Grid needs 15 minutes to forward on user data. We would argue that a 5 minute margin of error should be sufficient and the reporting timescales should be increased to 55 minutes. Alternatively less prescriptive drafting could be substituted stating that a user must provide the relevant information to National Grid to ensure that it is published within one hour of the user's decision on unavailability being made.</i> |
| Do you have any additional comments? | <i>As MODIS is the GB markets principal route of compliance with the requirements of the Transparency Regulation, we think that National Grid should have an explicit obligation in the Grid Code to report on a monthly basis the percentage</i> |

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| | <p><i>of time that the MODIS system was available for use by users. This will give industry visibility and in turn confidence in the robustness of the MODIS solution.</i></p> |
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Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 21 July 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

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| Respondent: | Alastair Frew |
| Company Name: | ScottishPower |
| Do you support the proposed Implementation approach? | Yes |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? | Yes |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | Yes |
| Does the proposed Grid Code drafting implement the intended changes effectively? Does the proposed Distribution Code drafting implement the intended changes effectively? | Yes, however the new paragraph being added has now been changed to PC.A.3.4.3 from PC.A.2.2.8 in the previous draft, this has not been carried through all the proposed draft text. |
| Do you believe that the proposal better facilitates the Grid Code objectives? Do you believe that the proposal better facilitates Distribution Code objectives? | Yes |
| Do you support the proposed Implementation approach? | Yes |
| Do you believe that the proposed timescales are appropriate? | If the data is required by 4 January 2015 and some submissions are not until week 24, does this mean there will be a period of non-compliance? |
| Do you have any additional comments? | No |

Grid Code Industry Consultation Response Proforma

GC0083: European Transparency Regulation Implementation

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 **21 July** 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.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

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| Respondent: | Russell Fleetwood CEng FIET Generation Manager T: 0208 305 9948 M: 0778 633 5086 E: russellfleetwood@tfl.gov.uk |
| Company Name: | London Underground |
| Do you support the proposed implementation approach? | Yes |
| Do you believe that GC0083 better facilitates the appropriate Grid Code objectives? Yes | <p><i>For reference the applicable Grid Code objectives are:</i></p> <p><i>(i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i></p> <p><i>(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);</i></p> <p><i>(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</i></p> <p><i>(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 to permit the</i></p> |

| | |
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| | <i>development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;</i> |
| Are the proposed Code changes necessary given that the Transparency Regulations are directly applicable as European Law? | <i>Yes</i> |
| Does the proposed Grid Code drafting implement the intended changes effectively? Does the proposed Distribution Code drafting implement the intended changes effectively? | <i>Yes</i> |
| Do you believe that the proposal better facilitates the Grid Code objectives? Do you believe that the proposal better facilitates Distribution Code objectives? | <i>Yes</i> |
| Do you support the proposed implementation approach? | <i>Yes</i> |
| Do you believe that the proposed timescales are appropriate? | <i>Yes</i> |
| Do you have any additional comments? | Please can you confirm process/details of providing the required data to NGET and whether this needs to be annual as (submitted December of previous year) as well as week 24? |