Grid Code Modification Proposal Form	At what stage is this document in the process?
# GC0130: OC2 Change for simplifying 'output useable' data submission and utilising REMIT data	01 Proposal Form 02 Workgroup Consultation 03 Workgroup Report 04 Code Administrator Consultation 05 Draft Grid Code Modification Report 06 Final Grid Code Modification Report

Purpose of Modification:

The current system used by Generators for submitting outage and output useable data is called Transmission Outages Generator Availability (TOGA). This system is currently reaching the end of its life and is soon to be decommissioned. Feedback from industry work groups highlighted that Generators no longer want to submit data to TOGA as they are already required to submit higher resolution data under the Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) obligations. In adopting this approach, it would avoid duplication, and prevent the need to use the existing TOGA system which requires submissions to only be made once a day.

In view of the aging nature of the TOGA system, and the desire of the Generator community to move to the REMIT obligations, a project was established by National Grid Electricity System Operator (ESO) in 2017 to see how these objectives could be achieved. This has been followed by subsequent discussions and engagement with the wider Generator community.

The Larger Generators already use REMIT though they also need to submit data under TOGA as well to ensure they comply with the current requirements of Grid Code Operational Code 2 (OC2). There are still however a number of Smaller Generators who submit OC2 data via TOGA alone and are not yet using the REMIT system.

With the desire of the Generator community to move towards REMIT, the obligations under OC2 require some rationalisation as the data required under REMIT is slightly different to that under TOGA. The current OC2 data would therefore require some streamlining to ensure the submitted REMIT data would be compliant with the requirements of OC2. For those Generators who still supply data via TOGA, then any change to OC2 would still mean that they are submitting data which is compliant with the requirements of OC2 whilst the advantage is that

any Generator who submits data via REMIT and TOGA would, once the proposed changes have been made to OC2, only need to supply data via REMIT.

As a separate piece of work, National Grid ESO are working with the Generator community to decommission the TOGA platform. In the main, the impact of this is already being managed as the majority of Generators already submit their data through REMIT. For those Generators who still use TOGA, National Grid ESO will help guide new users to REMIT as we would during any system change or upgrade.

So far as the proposed Grid Code change to OC2 is concerned, the cost impact to the Generator community is negligible as OC2 will be streamlined so that Generators who currently submit data via REMIT will no longer have to submit data via TOGA and for those Generators who submit data via TOGA, they would still be compliant with OC2, even when they eventually transfer to the REMIT platform.

Submitting REMIT data also has benefits and can be achieved manually or through either File Transfer Protocol (FTP) or Application programming interface (API).

A few sections of the Grid Code also need to be revised to allow for this as this is a single stream of data, so all the time related parts surrounding daily, weekly and yearly submissions can be removed along with the zonal margin section which is no longer used and associated text changes to allow for the automation of the Negative Reserve Active Power Margin (NRAPM) and Operational Planning Margin Requirement (OPMR) processes.

This will lead to savings by removing duplication and improved data quality on which calculations of Margin and Surplus will be made and reported to industry.

	**The Proposer recommends that this modification should be:** • Assessment by Panel • Proceed to consultation This modification was raised 13 August 2019 and will be presented by the Proposer to the Panel on 29 August 2019**.** The Panel will consider the Proposer's recommendation and determine the appropriate route.
	**High Impact**: None specified
	**Medium Impact**: None specified
	**Low Impact:** Generators who already have REMIT will (once this modification has been approved) only need to submit data via REMIT and not REMIT and TOGA. Generators who submit data via TOGA will still be compliant with the requirements of OC2 and will be able to submit data via TOGA until the TOGA System is eventually decommissioned. The process of moving Generators to the REMIT System who are not already using REMIT is a completely separate process which is being managed outside the Grid

	Code. When OC2 is updated, data can be submitted by Generators either via REMIT or TOGA. This will create simplifications for both National Grid ESO and Generators.

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Timetable

The Code Administrator recommends the following timetable:

Code Administration Consultation Report issued to the Industry	13 September 2019
Draft Self Governance Report presented to the Grid Code Review Panel	29 October 2019
Grid Code Review Panel decision	29 October 2019
Appeal window	8 November 2019 to 29 November 2019
Decision implemented in Grid Code	13 December 2019

Any questions?

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Proposer Details

Details of Proposer: (Organisation Name)	National Grid ESO
Capacity in which the Grid Code Modification Proposal is being proposed: (e.g. CUSC Party)	Grid Code OC2 change
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	 Jian Sun National Grid ESO Jian.Sun@nationalgrideso.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	 William Jones National Grid ESO William.Jones4@nationalgrideso.com
Attachments (Yes/No): Yes **If Yes, Title and No. of pages of each Attachment:** "**OC2_10_OPE_changes_v2.0.docx**" – OC2 changes (28 pages) "**other_GridCode_changes_v2.0.xlsx**" – OC2 changes (1 sheet)	

Impact on Core Industry Documentation.

Please mark the relevant boxes with an "x" and provide any supporting information

BSC	
CUSC	
STC	
Other	X

This change only impacts on Operating Code 2 of the Grid Code.

1 Summary

Defect

1. Duplication of data submission under both Grid Code OC2 and REMIT regulation.

2. Data latency and inconsistences between OC2 data and REMIT data causing grid operation and market confusion.

3. Simplification and flexibility of submission process. In future (once this change has been approved) Generators will be able to submit data via REMIT channels

4. Feedback from the industry is that the current Grid Code OC2 generation section is not used effectively and has not evolved in line with the latest changes to the electricity industry. It also means that as currently written, Generators who submit data by REMIT would also need to submit data via TOGA to remain compliant with OC2.

5. The OC2 Zonal generation process is still run which is now out of date and no longer used.

6. Data beyond 3 years ahead is very inaccurate and therefore not adding value.

7. It is eventually planned to decommission the TOGA System and replace it with REMIT. Changes to OC2 will permit the submission of data via either system without breaching the requirements of the Grid Code.

What

The Grid Code needs to be updated to allow the following:

1. To remove the requirement to submit OC2 generator availability and outage submissions in a specific way. As written, OC2 accepts the data in TOGA format but not that submitted under REMIT. Going forward, when this change is made, generator availability and outage submission data could be submitted either via TOGA or REMIT.
2. Reduce the availability data requirement from up to 5 years to 3 years as there is less value in the longer-term data beyond 3 years, which is in line with current REMIT data requirements.
3. Simplify the OC2 process – daily, weekly and yearly submissions to TOGA are no longer required. Generators will only need to submit data when there is a change to their planned Output Useable values.
4. Change the text to allow automation of NRAPM forecasting and publication.
5. Remove reference to the OC2 Zonal process.

National Grid ESO will work with Generators who still only use the current TOGA System so in future they can submit data either via Market Operation Data Interface System (MODIS) or the Elexon REMIT portal. This process is being managed

separately but will not affect the Grid Code changes to OC2 which would still enable data to be submitted either via REMIT or TOGA.

This Grid Code change is required to implement simplification of processes, remove duplication as requested by the industry and simplify the structure of OC2.

This will allow a wider range of submission though FTP, API or using a Graphical User Interface (GUI). REMIT will then become our source data for OC2.

Why

1. Meets the industry feedback to stop duplication.
2. Enables the simplification of the submission process
    - Only one system is required for Generators to submit data to.
    - Removes the requirement to submit daily, weekly and yearly data.
    - Only one stream of data is required.
3. REMIT data is published more frequently by Generators allowing:
    - National Grid ESO to publish data more accurately and more frequently to the market.
    - Potential to deliver reporting at increased cardinal points to the industry.
4. The OPMR will be simplified to more accurately reflect its requirement and provide clarity of its meaning.
5. Once the Grid Code change has been made Generator data will be able to be submitted either via REMIT or TOGA and will also enable TOGA to eventually be decommissioned.

How

Amend OC2 code to facilitate the above objectives; this will be achieved by clearing up what will become redundant text related to timescales and addressing other issues which are no longer required.

As a separate piece of work, the migration from TOGA to REMIT will be supported by National Grid ESO through direct communication with those Generators that currently submit OC2 data to TOGA. Going forward, for those Generators submitting data through MODIS or the Elexon portal, submission can be through a number of channels such as FTP, API and direct to GUI.

2 Governance

Justification for Self-Governance Procedures

We request to use the Self-Governance procedures based on:

The current scope of OC2 scope will not be changed by the proposed modification and so is unlikely to discriminate between different classes of Grid Code Parties and therefore this modification has no material effect on existing or future electricity customers.

The modification is to simply optimise the current OC2 process to provide greater flexibility and promote improved reporting in terms of data resolution, publishing interval of current reports and cost savings. In addition, the OC2 changes will enable Generators to submit data either by REMIT or TOGA although it is recognised that REMIT is the better System going forward and after a transitional period TOGA will be decommissioned.

***Self-Governance - The modification** is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:*

i) Existing or future electricity customers;

ii) Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,

iii) The operation of the National Electricity Transmission System

iv) Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies

v) The Grid Code's governance procedures or the Grid Code's modification procedures

Requested Next Steps

This modification should:

- proceed to Code Administrator Consultation. We do not believe a workgroup is necessary because the proposed changes provide greater flexibility to Generators, avoid duplication, enable data to be submitted either via REMIT or TOGA and reduces the volume of legal text in OC2. In addition, the legal text changes are minor and the impact of the code change is anticipated to be low.

The estimated completion of the strategic TOGA project is Q1 2020.

3 Why Change?

The proposed change is responding to feedback from the industry on the current use of the OC2 process to provide Generator Output Useable (GOU) and outage data. It has been recognised during workshops with industry that using REMIT would provide a better source of data for Output Useable when compared to TOGA; however, this modification will simplify the data submission process such that Generators will be able to submit OC2 data either via REMIT or TOGA. This modification will also facilitate the eventual transition to the REMIT system as and the TOGA System is eventually decommissioned.

If the change is not made:

- Power stations will continue to be required to submit duplicate data both to OC2 via TOGA and REMIT.
- Feedback from the industry will have been ignored
- Data is only submitted once a day and does not reflect current market conditions thus causing distortion and reducing accuracy.
- Use of OC2 will further diminish and therefore quality of industry published reports further impacted.
- The total costs to the industry to provide Output Usable data to the market and National Grid ESO will increase as a new GOAMP platform would need to be implemented rather than making use of the REMIT facility.

4 Code Specific Matters

Technical Skillsets

- Representative Generator companies
- National Grid ESO representatives for Output Useable data and process
- Elexon REMIT portal representatives

Reference Documents

5 Solution

Please see a separate OC2 document attached with proposed changes.

"**OC2_10_OPE_changes_v2.0.docx**" (28 pages)

6 Impacts & Other Considerations

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

This modification does not impact on a SCR. Industry will benefit from more accurate reporting and reduction of duplication of data entry.

Consumer Impacts

More accurate and timely data used to calculate margin values will provide National Grid ESO with better clarity of potential balancing issues and therefore indirectly provide consumer benefit from savings made in balancing actions.

7 Relevant Objectives

Impact of the modification on the Applicable Grid Code Objectives:	
Relevant Objective	Identified impact
(a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	Positive
(b) Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	Positive
(c) Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;	Positive
(d) To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and	Positive
(e) To promote efficiency in the implementation and administration of the Grid Code arrangements	Positive

Objective (a): the proposed changes are more efficient in reducing duplication when submitting data under OC2.

Objective (b): The proposal will result in better OC2 data quality, reduced inconsistences and more frequently reports publishing back to the market, which will

facilitate effective competition and better market situation awareness in the generation and supply of electricity.

Objective (c): effective competition and better market situation awareness through the data received will promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system.

Objective (d): removal of duplicate data submission from both TOGA and REMIT, and the reduction of data inconsistencies between OC2 and REMIT.

Objective (e): the proposal includes some housekeeping modifications required in OC2 as a result of historical documentation errors relating to Generator Output Usable.

8 Implementation

It is estimated that this modification would be implemented by Q1 2020. This would align with the separate piece of work to move existing TOGA Users (who do not have REMIT) over to the new REMIT Platform, any new users would be guided to REMIT.

9 Legal Text

"**OC2_10_OPE_changes_v2.0.docx**" – OC2 changes (28 pages)

"**other_GridCode_changes_v2.0.xlsx**" – Other Grid Code changes (1 sheet)

10 Recommendations

Proposer's Recommendation to Panel

Panel is asked to:

- Agree that Self Governance procedures should apply
- Agree that this should proceed to Code Administrator Consultation

11 ACRONYMS LIST

API	Application programming interface
BMRS	Balancing Mechanism Reporting Service
ESO	Electricity System Operator
FTP	File Transfer Protocol
GOAMP	Generator Outage and Margin Process
GUI	Graphical User Interface
MODIS	Market Operation Data Interface System
NGESO	National Grid Electricity System Operator
NRAPM	Negative Reserve Active Power Margin
OC2	Grid Code Operational Code 2
OPMR	Operational Planning Margin Requirement
OU	Output Usable
Q1	Quarter 1
REMIT	Regulation on Wholesale Energy Markets Integrity and Transparency
TOGA	Transmission Outages Generator Availability

