

A nighttime photograph of a city street, likely in London, featuring the Gherkin building (30 St Mary Axe) illuminated in the background. The street is filled with pedestrians and streetlights, creating a warm, golden glow. The buildings are multi-story and have many lit windows.

GC0130:OC2

Change for allowing the utilization of REMIT data

Proposal

The original proposal

Stop duplication by changing the code to allow the providing NGENSO with “output usable” data to be met by either REMIT submissions or TOGA submissions. Decommissioning TOGA after a few months and switching to only using REMIT submissions via the Elexon Remit platform.

Issues:

1. Can not provide a legal statement that using the REMIT platform will not have unintentional REMIT obligations on a generator not currently captured by them.
 2. What happens with BREXIT? (Potential change in REMIT requirements for UK)
 3. Still need a solution for multi-shaft units (missed from the original requirements)
 4. Allowing both sets of data for a transition period would be a manual work around to populate current toga system which was felt not to be robust.
- The proposer at the time submitted another option “Option 2” just building a new TOGA with its own data submission platform and not using REMIT data. This does not meet the main defect of the duplication but did give many of the other benefits.

The new proposal – Option 3 (similar to that voiced at the first work group)

Will allow use of a new TOGA platform to make submissions along with REMIT submissions via the Elexon REMIT portal. The new platform will accept data the same frequency and format as REMIT submissions.

The code changes will align with closely REMIT requirements ie. 3 year ahead, a output profile (start and end date and time and level) and updated only on change within 30min. A new requirement to cover multishift units would be added which would have to submit though the new TOGA platform at the higher resolution but can still submit at the BMU level to Elexon REMIT. We can report as often as required.

1. Code changes will have to come in on a set date as new system would need to be in place to enable the above.
2. Solves the main defect and all other defects in the original proposal.
3. No Brexit impact.
4. Generators can chose the route to provide data either via REMIT portal or directly to us - no risk of unintentional compliance.
5. No impact to 80% of generators just gains to stop providing TOGA data.
6. Current generators only submitting via TOGA will need to change their format of data but will have to update less regularly (only on a change) and a greater range of submission routes (Ie API, FTP and GUI). Would have been required anyway on a new software solution.

Benefits (same as option 1)

- Potential consumer benefits realised by reduced administrative costs all round and a more complete, appropriate and useful data set allowing better planning
 - Enables the simplification of submission process, removes the requirement to submit weekly, daily and yearly.
 - One stream of data reducing data inconsistency and reducing costs for the Generator.
 - Automation of OC2 data provision and processing - reducing costs in administration and errors from human factors.
 - As submissions on change data allowing NGENSO to:
 - Publish data more accurately and more frequently to the market.
 - Potential to deliver increased cardinal points to the market.
 - Better data resolution of Output Usable data for the market.
- Allows for a wider range of submission though FTP, API or using a GUI which increasing flexibility.

The process and impacts

- No additional data needs be provided, most generators already submit to REMIT and know details of REMIT submission format.
- Time lines are GO LIVE of the new system in Q2 2020 (may change).
- For Generators with multiple generator units for example CCGT modules we will require information at the generator unit level to the new TOGA so there will still be slight duplication but only small subset of users.
- For small generators that have no requirement to comply with REMIT regulations they can submit to NGENSO to fulfil their OC2 obligation.
- Any changes would have come from a system change anyway not just as a result of this mod.

Option Details

#	Details of proposed change	1	2	3	4
		REMIT	TOGA	Either	No change
		REMIT replaces TOGA (after an interim period where generators have option of using either)	Only use TOGA. (Improvements built into TOGA)	Able to use TOGA or REMIT (Goes live when new TOGA is launched)	No change to codes or processes
1	Remove requirement for generators to submit OC2 availability and outage submissions in a specific way (to TOGA or REMIT)	✗	✗	✓	✗
2	Daily, weekly and yearly submissions no longer required. Generators only need to submit data when there is a change to their planned Output Useable Values	✓	✗	✓	✗
3	Upgrade current TOGA (GOAMP) OC2 platform to more powerful hardware and software to make it more user-friendly and to increase reliability of the system.	✓	✓	✓	✗
4	Reduce year 1-5 data submission to year 1-3 for OC2 yearly process	✓	✓	✓	✗
5	Remove Zonal process including zonal margin/surplus removal	✓	✓	✓	✗
6	Optimise OPMR process	✓	✓	✓	✗
7	Allow automation of NRAPM forecasting and publication.	✓	✓	✓	✗
8	Automate OC2 daily/weekly/yearly process to improve performance and reduce human-errors	✓	✓	✓	✗

Risks / Costs

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1	Duplication: Most generators have to submit data to 2 systems		●		●
2	Cost impact on generators due to change in OC2 requirements	●	●	●	
3	Smaller generators having to switch from TOGA to REMIT, may become subject to additional REMIT requirements)	●			
4	Change to REMIT to filter submitted insider messages if generators don't want their data forwarded to ENTSO-E's ETP.	●			
5	Multiple datasets in TOGA (existing TOGA inputs and converted REMIT inputs)	●			
6	Brexit risk, potential change in REMIT requirements for UK	●			
7	BSC mod required	●	●	●	
8	Multi-shaft outages not covered by solution	●			
9	Manual interim solution to transfer data from REMIT to TOGA	●			
10	Existing TOGA is not supported beyond cQ1 2020 and requires manual support whilst still in use				●