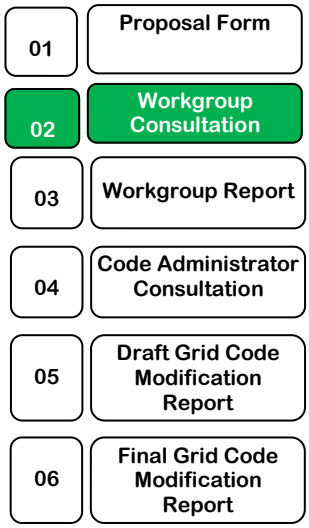
Grid Code Workgroup Consultation	At what stage is this document in the process?

GC0130: OC2 Change for simplifying 'output useable' data submission and utilising REMIT data



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 workgroups 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.

Initially when this Proposal was raised, the intension was for all parties to transfer the data submissions from TOGA to REMIT. However it has been identified this is not the best way forward and the updated Proposal, that we are now consulting on, is that a new TOGA will exist alongside REMIT with parties being able to submit their OC2 data only once using either platform. The transfer of data submission to the new arrangements will be carried as a separate piece of work by National Grid ESO. In the main, the impact of this is already being managed as most Generators already submit their data through REMIT. National Grid ESO will help guide new users to REMIT or the new TOGA as we would during any system change or upgrade.

The cost impact to the Generator community would be negligible as OC2 will be streamlined so that Generators who currently submit data via REMIT will no longer have to submit data via TOGA. For those Generators who wish to submit via the new TOGA, the cost will also be minimal as the change required would be negligible, and in line with a normal system update.

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. Therefore, we will remove the obligation on ESO to publish Zonal OC2 data and remove all obligations with respect to 4 and 5 year ahead data, by reducing to a rolling 3 years, in line with REMIT. We will also make associated legal 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.

This document is the Workgroup's consultation and it is seeking views on the questions set out in Section 5 below.

Any interested party can submit a consultation response by following the guidance set out in Section 5 of this document.

Published on: 2 December 2019

Length of Consultation: 15 Working days

Responses by: 23 December 2019

High Impact: None specified

	Medium Impact: None specified
	Low Impact: Generators who already have REMIT would no longer also need to submit data to TOGA. Generators who submit data via TOGA will still be compliant with the requirements of OC2 and will be able to submit data via the new TOGA system. The process of moving Generators to either the new TOGA or REMIT Systems is a 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 Electricity System Operator (NGESO) and Generators.

Contents

Any questions?

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Timetable

The Code Administrator recommends the following timetable:	
Initial consideration by the Workgroup	1 October 2019
Workgroup Consultation	2 December 2019
Workgroup Consultation closes	23 December 2019
Code Administration Consultation Report issued to the Industry	March 2020
Draft Self Governance Report presented to the Grid Code Review Panel	22 April 2020
Grid Code Review Panel decision	22 April 2020
Appeal window	20 May 2020
Decision implemented in Grid Code	3 June 2020

1 About this document

This document is the Workgroup's consultation and it is seeking views on the questions set out in Section 5 below. Any interested party can submit a consultation response by following the guidance set out in Section 5 of this document.

The Workgroup was formed in October 2019 to develop and assess the proposal. Section 4 of the Workgroup contains the discussion by the Workgroup on the Proposal and the potential solution.

Section 2 (Original Proposal) and Section 3 (Proposer's solution) are sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported or refuted by the Workgroup.

The Grid Code Review Panel (the Panel) detailed in the Terms of Reference the scope of work for the GC0130 Workgroup and the specific areas that the Workgroup should consider.

The table below details these specific areas and where the Workgroup have covered them or will cover post Workgroup Consultation.

The full Terms of Reference can be found in Annex 1.

Terms of Reference summary

Specific Area	Location in the report
Implementation and costs	Section 4
Review draft legal text should it have been provided. If legal text is not submitted within the Grid Code Modification Proposal the Workgroup should be instructed to assist in the developing of the legal text	Section 4
Consider whether any further Industry experts or stakeholders should be invited to participate within the Workgroup to ensure that all potentially affected stakeholders have the opportunity to be represented in the Workgroup. Demonstrate what has been done to cover this clearly in the report	Section 4
Consider regulatory implications on generators <100MW	Section 4
Consider cross code impacts particularly the BSC	Section 4

Acronym Table

Acronym	Meaning
API	Application programming interface
BMRS	Balancing Mechanism Reporting Service
ENTSO-E	European Network of Transmission System Operators for Electricity
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. This is a data platform administered by ELEXON.
The Panel	Grid Code Review Panel
TOGA	Transmission Outages Generator Availability. This is a data platform administered by NGESO.

2 Original Proposal

Section 2 (Original Proposal) are sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported or refuted by the Workgroup.

Below is an updated version of the original document, edited for clarity. The original proposal can be found here.

Defect

1. Duplication of data submissions: Generators who submit data by REMIT also need to submit data via TOGA in order to comply with Grid Code section OC2.

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

3. As TOGA only collects availability data once a day, at a set time, this means that subsequent changes before the next update are not communicated to industry, meaning that data can be up to one business day out of date.

4. The OC2 Zonal generation process, which is calculated by TOGA, is now out of date and no longer used.

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

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.

The Proposer stated that the reasons that the change is necessary is as follows:

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:
    - NGESO 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.

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. Alternatively, the Authority may be required to take enforcement actions to ensure that all parties meet their legal obligations under OC2.

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.

NGESO will work with Generators during the transition from current TOGA System so in future they can submit data either via the new TOGA system or the 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.

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 introduction of the new TOGA system and option to select data submission either through TOGA or REMIT will be supported by NGESO through direct communication with those Generators that currently submit OC2. Those Generators not covered by REMIT will still have the option to submit data via the new 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.

3 Proposer's Solution

Section 3 (Proposer's Solution) is sourced directly from the Proposer and any statements or assertions have not been altered or substantiated/supported or refuted by the Workgroup.

Below we have outlined details of the new proposal. This is the proposal that was discussed at the Workgroup 2, and this is the solution we are now consulting on.

In summary, a new TOGA platform will be built to replace the current GOAMP version. Either TOGA or REMIT can then be used for OC2 data submissions.

The new TOGA will be set up to accept data in the same frequency and format as current REMIT submissions. OC2 requirements will be amended to align closely with REMIT requirements i.e. a rolling 3 year ahead, an output profile (start and end date and time and level with a description field) and updated only on change within a suggested 60min (although the time is up for discussion).

The details and benefits of this solution are as follows:

Stops duplication	Participants who are subject to REMIT data requirements will no longer need to provide data directly to TOGA, as the new TOGA will access the REMIT submissions via the Elexon REMIT portal. REMIT users will either enter their data directly or via MODIS.
More flexibility with option to continue using TOGA	Participants who don't have to submit data to REMIT but are covered by the OC2 requirements 'output usable' data requirements can either continue submitting data to TOGA (in the new format) or submit to REMIT.
Data latency and inconsistences removed	OC2 requirements will be amended to align closely with REMIT data requirements. Daily, weekly and yearly data will no longer be required. Generators will only need to submit data when there is a change to their Output Useable Values.
Data beyond 3 years no longer required	The OC2 requirement for availability data will change from 5 years to 3 years since there is little value in data beyond 3 years as it is less accurate. This change also aligns with REMIT requirements.
OC2 zonal margin process removed	This will be removed as it is now out-of-date and no longer used.

Increased automation	The new TOGA will be fully automated, including the OPMR and NRAPM processes.
Improved reporting for industry	NGESO will be able to publish data more accurately and more frequently to the market, with potential to deliver reporting at increased cardinal points to the industry at a later date.
Better solution for Brexit uncertainty	The requirements for both TOGA and REMIT are aligned, meaning that if necessary in the future, participants using REMIT could transfer their submission to TOGA.
More submission routes	Users of both systems will be able to use several channels such as FTP, API and GUI.
Multi-shaft units still covered	Generators covered by OC2 requirements will still need to submit Multi-shaft data to NGESO for internal use. The details of the actual shafts will be included in the description field of both REMIT and TOGA submissions. The new TOGA system will then decode this where required to fulfil NGESO's requirement to collect the data, with no impact on other systems. This means those submitting multi-shaft unit data can choose to submit it to either system, but don't need to submit it to both.

Impact on Participants

We believe that approximately 80% of generators are already submitting REMIT data, so they would be able to turn off their data feed to TOGA when this solution goes live.

Generators who are currently only submitting data to TOGA will need to change their format of data but will have to update less regularly (only on a change) and all submission frequency of daily, weekly and yearly will no longer be required. There is also likely to be a greater range of submission routes (i.e. API, FTP and GUI).

Even if this modification is not implemented, changes to submission formats are still likely to be required in 2020 as the current TOGA GOAMP is reaching its end of life and a new software solution would be built.

Comparison of risks/costs

Below is a comparison of the costs/risks that apply to the current situation, the original solution and the new solution.

KEY: ● **Each circle represents a risk/cost**

	As Is	ORIGINAL Solution	NEW Solution
	No change to codes or processes	REMIT replaces TOGA for OC2 submission, after an interim period where either can be used	Either TOGA or REMIT can be used for OC2 submissions
Duplication: Most generators must submit similar data to both REMIT & TOGA	●		
Cost impact on generators due to change in OC2 data submissions requirements	●[1]	●	●
Beyond cQ1 2020, existing TOGA is not supported and will need manual cover	●		
Additional Grid Code mod needed later, to approve switching off TOGA		●	
Smaller generators must switch from TOGA to REMIT and may become subject to additional REMIT requirements		●[2]	
REMIT change needed to filter submitted insider messages if generators don't want their data forwarded to ENTSO-E's ETP.		●	
Multiple datasets in TOGA (existing TOGA inputs and converted REMIT inputs)		●	
Brexit risk, potential change in REMIT requirements for UK		●	
BSC mod required		●	●[3]
Multi-shaft outages not covered by solution		●	
Manual interim solution needed to transfer data from REMIT to TOGA		●	

[1] Even if there is no change, a change to OC2 data submissions is likely to be required when the existing TOGA is decommissioned and replaced by a new version.

[2] Feedback from the workgroup was that users could choose to use the REMIT data exchange platform without changing their obligations under the REMIT regulations, however this has been raised as a potential risk.

[3] The BSC mod that would be required for the new solution would be a simpler housekeeping mod, whereas the original solution requires more significant changes

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 NGESO with better clarity of potential balancing issues and therefore indirectly provide consumer benefit from savings made in balancing actions.

4 Workgroup Discussions

The Workgroup convened on 1 October 2019 to discuss the scope of the proposed defect, devise potential solutions and assess the proposal in terms of the Applicable Grid Code Objectives. The Workgroup will in due course conclude these tasks after this consultation (taking account of responses to this consultation).

The Workgroup discussed a number of the key attributes under GC0130 and these discussions are described below.

The Proposer presented their modification proposal to the Workgroup and explained that the key purpose of the modification was to remove duplication of data submission by large generators. The Proposer informed the Workgroup that the draft solution to address the defect was to allow parties to submit data through the Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT) platform and thus prevent the need to additionally use the Transmission Outages Generator Availability (TOGA) system. The reason for this proposed solution was due to NGESO considering withdraw TOGA in the future.

The Proposer highlighted a number of options in their presentation which can be found in annex 3 These options are as follows:

1. No change (status quo);
2. Only using REMIT for data submission; or
3. Only using TOGA for data submission
4. Providing a choice of using REMIT or TOGA for data submission

The Proposer advised that option 1 did not address the industry feedback about duplication of data submission. The proposer advised that this was the driver for raising this modification.

Regulatory implications on generators <100MW

In discussing the proposal as originally submitted to the Panel the Workgroup discussed the implications of potentially removing TOGA at a future date and the work that would be required to understand the impact of its removal as a data submission option. The Workgroup agreed that additional work was required to ensure that there would not be any unintended consequences of removing TOGA and using REMIT. A Workgroup member stated that a detailed impact assessment would be required to fully understand the implications of using the REMIT platform for all industry participants (also applicable for option 2). In particular, concern was raised in relation to parties that may wish to use REMIT for data submission but who are not currently subject to REMIT obligations (such as small generators and interconnectors), and whether they would now need to comply with those obligations if they started to submit data through the REMIT platform. The Proposer advised the Workgroup that they did not believe that such parties would have additional obligations as they had received legal advice from ELEXON to that effect. The Workgroup agreed that it would be beneficial if the legal advice could be shared with the Workgroup as this would deal with the concerns raised.

Following feedback from the Workgroup, the Proposer confirmed that their solution would focus on giving parties an option as to which platform they would like to submit data through rather than dealing with the potential decommissioning of TOGA. The Proposer agreed that in the event that TOGA will be decommissioned at a future date, a further modification should be raised whereby detailed analysis of the impact can be undertaken. It was agreed that a full impact assessment was not required in relation to the revised proposed solution.

The Workgroup considered the data submission. The Proposer stated that REMIT data (as opposed to TOGA data) is more transparent for the market. The Proposer advised that at present 80% of market participants that would be affected by this modification currently submit their data through REMIT. A Workgroup member stated that if REMIT is used as a submission option, it needs to be clear to market participants that are new to the platform that the data is passed to European Network of Transmission System Operators for Electricity (ENTSO-E). A workgroup member highlighted that interconnectors can submit their data directly to ENTSO-E, therefore this will need to be considered.

A Workgroup member highlighted that there may be an issue in respect of multi shaft users having to submit duplicate data through different platforms. The Workgroup discussed that affected market participants currently use MODIS to submit data. The Proposer confirmed that this modification would not affect the MODIS platform. The Workgroup agreed that a small proportion of industry participants would be affected as multi shaft users. The Workgroup agreed there would be value in seeking views from these affected parties through the Workgroup consultation process.

The Workgroup considered the amount of data collected under the REMIT and TOGA platforms. The Proposer advised that TOGA requires five years data to be submitted, whereas REMIT requires three years data to be submitted. The Workgroup agreed that the amount of data would need to be aligned in order for the solution to work. The Proposer confirmed that they would be changing the TOGA submission requirement to three years to align with REMIT.

At the second workgroup meeting the Proposer introduced a revised solution, that a new TOGA platform will be built to replace the current GOAMP version, which will permit Users submit their OC2 data using either TOGA or REMIT. Also, the choice of platform used to submit data would be at a unit level rather than organisational level.

This would allow industry to submit data using a blend of the platforms (TOGA or REMIT or both) if required, therefore providing maximum flexibility to industry when submitting data to NGESO to meet its obligations.

A further revision of the proposed solution will allow participants with multi-shaft units to add the shaft level detail into the TOGA or REMIT using the text description and the TOGA system will extract this information needed from there, This means no duplication and can be submitted to either system at the BMU level (not both)

Cross Code Impacts

The Workgroup discussed the potential cross code impacts that this modification would have. The Workgroup agreed that the Balancing and Settlement (BSC) code would be affected but further work was required to establish the extent of the required changes and this would be dependent upon the final solution. The Workgroup agreed the BSC modification should be raised concurrently with this modification. ELEXON advised that they believe that minor changes to the BSC would be required.

Implementation and costs

The Workgroup discussed the potential system changes and the impact on ELEXON. ELEXON advised that there may be a requirement to make IT changes to the REMIT platform. The costs of this are currently unknown until the solution has been agreed.

The Proposer confirmed that they were aiming for an implementation date in Quarter 1 of 2020.

Industry experts / stakeholders

The Workgroup discussed whether the right parties were part of the Workgroup. It was agreed that at present this was fine but that this should be kept under review.

5 Workgroup Consultation Questions and How to Respond

The GC0130 Workgroup is seeking the views of Grid Code Parties and other interested parties in relation to the issues noted in this document and specifically in response to the questions highlighted in the report and summarised below:

Standard Workgroup Consultation questions:

Q1: Do you believe that GC0130 Original proposal better facilitates the Applicable Grid Code Objectives?

Q2: Do you support the proposed implementation approach?

Q3: Do you have any other comments?

Q4: Do you wish to raise a Workgroup Consultation Alternative request for the Workgroup to consider?

Specific GC0130 Workgroup Consultations Questions:

Q5: Which system do you think you would use for your data submission, i.e. TOGA, Remit or both if given the choice?

Q6: We will define in the Grid Code that each generator shall provide The Company with any changes to the available Output Usable from now until 3 years ahead. We propose for an unplanned Event, the Generator shall provide the data within 1 hour of the event occurring, and for a planned Event, the Generator shall provide the data within 1 hour of the planning of the Event. This in REMIT is within 5 minutes, so:

For non-REMIT submissions (direct to TOGA), on a known change of output, within what timeframe do you think these changes should be notified to National Grid ESO (where 1 hour is the example above)?

Q7: Does the use of the REMIT description field for multi-shaft data cause any existing Users any problems?

Q8: Can you confirm that you are happy for the removal of margin zonal data, if you are not, please explain the issue?

Q9: Can you indicate the amount of time you would require to prepare for the change in how data is submitted to NGESO where applicable.

Please send your response using the response proforma which can be found on the National Grid website via the following link:

https://www.nationalgrideso.com/codes/grid-code/modifications/gc0130-oc2-change-simplifying-output-useable-data-submission-and

In accordance with Governance Rule 20.13 of the Grid Code, any Authorised Electricity Operator, the Citizens Advice, the Citizens Advice Scotland, The Company or a Materially Affected Party may also raise a Workgroup Consultation Alternative Request. If you wish to raise such a request, please use the relevant form available at the weblink below:

http://www.nationalgrid.com/uk/Electricity/Codes/systemcode/amendments/forms_guidance/

Views are invited upon the proposals outlined in this document, which should be received by **5pm** on **23 December 2019**.

Your formal responses may be emailed to: grid.code@nationalgrideso.com.

If you wish to submit a confidential response, please note that information provided in response to this consultation will be published on National Grid's website unless the response is clearly marked "Private and Confidential", we will contact you to establish the extent of the confidentiality. A response market "Private and Confidential" will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Grid Code Review Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

Please note an automatic confidentiality disclaimer generated by your IT System will not in itself, mean that your response is treated as if it had been marked "Private and Confidential"

6 Relevant Objectives

This section outlines the Proposer's view of how this modification meets the Applicable Grid Code 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.

7 Implementation

Once the Grid Code has been approved we would contact all current TOGA GOAMP users to explain the changes and outline what they need to do in either switching off their feed to TOGA (for those submitting to REMIT), or changing the format and frequency of submissions (for those continuing to use TOGA).

Timelines are GO LIVE of the new system in Q2 2020 (although this date may change).

The Code changes will have to come in on a set date as new system would need to be in place to enable the above.

8 Legal Text

The draft legal text can be found in Annex 2 of this document. The legal text comprises of OC2 changes (28 pages) and other required Grid Code changes (1 sheet).

Annex 1: GC0130 Terms of Reference

Annex 2: GC0130 Legal Text

Annex 3: Proposer's Presentation

