

## Grid Code Workgroup Consultation Response Proforma

### GC0130 – OC2 Change for simplifying ‘output useable’ data submission and utilising REMIT data

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 **5pm on 23 December 2019** to [grid.code@nationalgrid.com](mailto: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 by the Workgroup.

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| <b>Respondent:</b>  | <i>Sallie Griffiths    <a href="mailto:sallie.griffiths@nationalgrid.com">sallie.griffiths@nationalgrid.com</a></i> |
| <b>Company Name:</b>  | <i>National Grid Interconnectors Ltd</i>  |
| <b>Please express your views regarding the Workgroup Consultation, including rationale.</b><br><br><b>(Please include any issues, suggestions or queries)</b> |   |

### Standard Workgroup Consultation questions

| Q | Question  | Response   |
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| 1 | Do you believe that GC0130 Original proposal, the proposed alternative in Annex xx or any potential alternative that you may wish to suggest better facilitates the Grid Code Objectives? | We believe the solution offered in this consultation better facilitates the Grid Code Objectives   |
| 2 | Do you support the proposed implementation approach?  | Generally, yes although the consultation does not set out the timelines for the new version of TOGA.   |
| 3 | Do you have any other comments?   | <b>Application of changes to market participants that are not “Generators”:</b><br>We need clarity regarding how this affects Interconnectors, the consultation is written in such a way that it looks as though it only affects Generators. Interconnectors who update both TOGA and BMRS are also affected. They are referenced more in the legal text but not this consultation document. |

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|  |  | <p>On Page 13 of your consultation you state that interconnectors are not subject to REMIT obligations this is not true as interconnectors <b>are</b> subject to REMIT obligations. They have to disclose any variation to normal capacity – both planned and unplanned outages. We do not believe this to be different to what generators have to submit. We are assuming therefore that the planned changes in the consultation are as relevant to interconnectors as they are to Generators.</p> <p>On the same page you also state that interconnectors have the choice to report their REMIT obligations directly to ENTSO-E – implying that this only applies to interconnectors. The Elexon BMRS portal is a recommended site to discharge REMIT obligations however it is not obligatory, and all market participants can choose other platforms to discharge their obligations. This is not unique to interconnectors and may be an option taken up by other market participants. Given this we would encourage NG ESO to examine all legal mechanisms through which market participants can discharge their REMIT obligations. Every participant following its REMIT obligations through whichever route should be able to take advantage of the relaxation of TOGA requirements, not just those using one REMIT reporting platform.</p> <p><b>Legal Text:</b><br/>We think that the legal text provided alongside the consultation could be made clearer:</p> <ul style="list-style-type: none"> <li>• At no point does the legal text propose any guidance about the interaction between REMIT and TOGA declarations. With more than one system and so method to discharge the Grid Code obligations, we feel that the Grid Code should set out how parties can discharge their OC2 obligations either using TOGA or using REMIT, perhaps included as an appendix to OC2.</li> <li>• The proposed legal text changes to OC2.4.1.2 states that applies to “Generators, defined by OC2.3.1 including (a) (b) and (e)”. OC2.3.1 (b) and (e) imply that all references to “Generator” apply to Interconnector Owners and Network Operators. This could cause confusion and so we would strongly advise that the text is redrafted so make it</li> </ul> |
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|   |   | <p>explicitly clear which obligations apply to Generators, which to Interconnector Owners and which to Network Operators.</p> <ul style="list-style-type: none"> <li>• After OC2.4.1.2. (d) the text places an obligation on parties to report for each individual shaft if a multi shaft generating unit or each individual pole if a multi-pole interconnector. While the obligation is clear, we believe that the means of discharging that obligation is not and that some further clarity should be given in the text on how REMIT declarations can be used to discharge the obligation.</li> <li>• There are a number of typographical and grammatical errors in the legal text</li> </ul> |
| 4 | Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider? | No   |

### Specific GC0130 questions

| Q | Question  | Response  |
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| 5 | Which system do you think you would use for your data submission, i.e. TOGA, Remit or both if given the choice?   | We would encourage any OC2 solution to ensure that parties do not have to continue to use both systems. The solution for multi-shaft / pole assets should be designed to avoid the need for those parties in particular to have to maintain potentially duplicate data in two systems. As existing mandated users of the REMIT system this is the one that we would prefer to use exclusively.  |
| 6 | <p>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:</p> <p>For non-REMIT submissions (direct to TOGA), on a known change of output,</p> | <p>Can you please provide more clarity on the statement “This in REMIT is within 5 minutes”? – is this how long it takes to publish the information? There is guidance that data in REMIT must be updated within an hour of the event occurring. We are not aware of the circumstances that have led to the “5 minute” requirement.</p> <p>Currently for REMIT we publish information (planned, unplanned) within 1 hour of it becoming precise onto the Elexon BMRS platform. This is a different requirement than the current version of TOGA which requires a single declaration each day.</p> |

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|   | <p>within what timeframe do you think these changes should be notified to National Grid ESO (where 1 hour is the example above)?</p> | <p>Due to the nature of the fact we can only update information once per day on the current TOGA system – we do not currently put all short unplanned outages on TOGA particularly those that commence after that day’s TOGA declaration but finish prior to the following day’s TOGA declaration. The only outages added to TOGA are long term planned outages.</p> <p>However all outages, whether short or long-term, are placed on REMIT which could lead to an inconsistency between reporting requirements for those just using TOGA and those using REMIT. Clarity needs to be given around the requirements on those just using TOGA and whether these parties will need to significantly increase the frequency of reporting and to report all outages, not just the long-term outages.</p> <p>While the consultation (page 15 “Q6”) states that information should be updated by participants within an hour of the event occurring, the legal text suggests that changes should be made at least once per day and up to hourly. Clarity needs to be given on the frequency of reporting updates.</p> |
| 7 | <p>Does the use of the REMIT description field for multi-shaft data cause any existing Users any problems?</p>                       | <p>The consultation refers to potential solutions that may be required for “Multi-shaft” generating units and refers to an unspecified process whereby a free text “Notes” field in the REMIT system may be used to provide additional data on such “Multi-Shaft” generating units. We would note that such provisions would also need to apply to multi-pole interconnector assets. This is included in the legal text, but no mention is made in the consultation. We would urge NG ESO to clarify within the code precisely how these requirements on “multi-shaft/pole” assets should be implemented via the REMIT declaration. As an interconnector asset owner potentially affected by these proposals we would be happy to discuss them in more detail.</p>  |
| 8 | <p>Can you confirm that you are happy for the removal of margin zonal data, if you are not, please explain the issue?</p>            | <p>Yes</p>  |

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| 9 | Can you indicate the amount of time you would require to prepare for the change in how data is submitted to NGESO where applicable. | If there is a new version of TOGA which requires additional training this needs to be factored in |
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