

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. 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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| Respondent: | <i>William Jones</i> william.jones4@nationalgrideso.com |
| Company Name: | <i>National Grid ESO</i> |
| Please express your views regarding the Workgroup Consultation, including rationale. (Please include any issues, suggestions or queries) | We support the Original proposal for the following reasons: <ul style="list-style-type: none">• The modification removes the duplication that is currently faced by approximately 80% of generators, who must submit similar ‘output usable’ data to both REMIT and TOGA to meet European and GB requirements respectively.• This modification would remove this duplication by enabling generators to fulfil the requirements of both via a single submission to the REMIT system.• Generators will still have the option to submit their data to TOGA. This will be done via a new, upgraded and fully-automated TOGA GOAMP platform expected to go live in 2020.• There are additional benefits of updating TOGA GOAMP, including: Generators would be able to submit data less frequently; out-of-date / unused data requirements are removed; data will be provided to industry more frequently and accurately• The workgroup listened to feedback from stakeholders, evaluated several potential approaches before coming to a solution that was supported by the workgroup. Therefore, we support this solution. |

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? | <p>We believe the proposal better facilitates all of the Grid Code Objectives as follows:</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> <ul style="list-style-type: none"> Positive. The proposed changes are more efficient in reducing duplication when submitting data under OC2 <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> <ul style="list-style-type: none"> Positive. The proposal will result in better OC2 data quality, reduced inconsistencies and increased frequency of reports published back to the market. This will facilitate effective competition and better market situation awareness in the generation and supply of electricity. <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;</i></p> <ul style="list-style-type: none"> Positive. The benefits to competition and better market situation awareness in (ii) will promote the security and efficiency of the electricity generation, transmission and distribution systems in the National Electricity Transmission System. <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; and</i></p> <ul style="list-style-type: none"> Positive. The modification improves efficiency by removing the need for many generators to |

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| | | <p>provide duplicate data submissions to TOGA and REMIT, and enabling them to meet the obligations of Grid Code and Regulation on Wholesale Energy Markets Integrity and Transparency with one single submission.</p> <p><i>(v) To promote efficiency in the implementation and administration of the Grid Code arrangements.</i></p> <ul style="list-style-type: none"> Positive. The proposal also includes some non-material changes required in OC2 as a result of historical documentation errors relating to Generator Output Usable, which will improve the accuracy of Grid Code. |
| 2 | Do you support the proposed implementation approach? | Yes |
| 3 | Do you have any other comments? | No |
| 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? | n/a – question for existing users |
| 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> | n/a – question for existing users |

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| | within what timeframe do you think these changes should be notified to National Grid ESO (where 1 hour is the example above)? | |
| 7 | Does the use of the REMIT description field for multi-shaft data cause any existing Users any problems? | n/a – question for existing users |
| 8 | Can you confirm that you are happy for the removal of margin zonal data, if you are not, please explain the issue? | n/a – question for existing users |
| 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. | n/a – question for existing users |