










Final Self Governance Modification Report	At what stage is this document in the process?												
<h1>GC0130: OC2 Change for simplifying 'output useable' data submission and utilising REMIT data</h1>	<table border="1"> <tr><td>01</td><td>Proposal Form</td></tr> <tr><td>02</td><td>Workgroup Consultation</td></tr> <tr><td>03</td><td>Workgroup Report</td></tr> <tr><td>04</td><td>Code Administrator Consultation</td></tr> <tr><td>05</td><td>Draft SG Grid Code Final Modification Report</td></tr> <tr><td>06</td><td>Final Grid Code Modification Report</td></tr> </table>	01	Proposal Form	02	Workgroup Consultation	03	Workgroup Report	04	Code Administrator Consultation	05	Draft SG Grid Code Final Modification Report	06	Final Grid Code Modification Report
01	Proposal Form												
02	Workgroup Consultation												
03	Workgroup Report												
04	Code Administrator Consultation												
05	Draft SG Grid Code Final Modification Report												
06	Final Grid Code Modification Report												
<p>Purpose of Modification: This modification is responding to feedback from the industry on the current use of the OC2 process to provide Generator Output Useable (GOU) and outage data. The proposed solution will simplify the data submission process such that Generators/Interconnectors will be able to submit OC2 data either via REMIT, or a new National Grid Electricity System Operator (NGESO) platform (previously TOGA-GOAMP), removing duplication for many. Changes to the OC2 requirements will lead to improved data quality on which calculations of Margin and Surplus will be made and reported to industry.</p>													
	<p>This Final Self Governance Modification Report has been prepared in accordance with the terms of the Grid Code. An electronic version of this document and all other GC0130 related documentation can be found on the National Grid ESO website via the following link:</p> <p>https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0130-oc2-change-simplifying-output-useable</p> <p>At the Grid Code Review Panel meeting on 28 May 2020, the Panel voted on GC0130 against the Applicable Grid Code Objectives. The Panel members unanimously agreed that the Original was better than the baseline and determined that it should be implemented.</p>												
	<p>Low Impact: Most Generators who already meet REMIT obligations would no longer also need to submit data to the NGESO platform. Generators/Interconnectors can submit data via the new NGESO platform if they do not have REMIT obligations.</p> <p>The process of moving Generators to either the new NGESO platform or REMIT system is a separate process which is being managed outside the Grid Code</p>												

When OC2 is updated, data can be submitted by Generators either via REMIT or the new NGESO platform. This will create simplifications for both NGESO and Generators.

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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
Workgroup Report issued to Panel	19 February 2020
Workgroup Report presented to Panel	26 March 2020
Code Administrator Consultation period (15 working days)	21 April – 13 May 2020

Draft Self Governance Report issued to the Grid Code Review Panel	19 May 2020
Draft Self Governance Report presented to the Grid Code Review Panel	28 May 2020
Grid Code Review Panel decision	28 May 2020
Issue to Panel to confirm votes held at Panel (5 working days)	29 May 2020 – 05 June 2020
Appeal window (15 working days)	01 July – 20 July 2020
Decision implemented in Grid Code	27 November 2020

1 About this document

This document is the Final Grid Code Self Governance Modification Report document that contains the discussion of the Workgroup which formed in October 2019 to develop and assess the proposal, the responses to the Workgroup Consultation which closed on 23 December 2019 and the voting of the Workgroup held on 14 January 2020. The Panel reviewed the Workgroup Report at their Grid Code Panel meeting on 26 March 2020 and agreed that the Workgroup had met its Terms of Reference and that the Workgroup could be discharged. This document also contains the responses received from the Code Administrator Consultation which closed on 13 May 2020.

GC0130 was proposed by National Grid ESO and was submitted to the Grid Code Review Panel for its consideration on 29 August 2019. The Panel decided to send the Proposal to a Workgroup to be developed and assessed against the Grid Code applicable objectives.

GC0130 aims to respond to feedback from the industry on the current use of the OC2 process to provide Generator Output Useable (GOU) and outage data. The proposed solution will simplify the data submission process such that Generators/Interconnectors will be able to submit OC2 data either via REMIT or the new NGESO platform. 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.

Workgroup Consultation

The Workgroup consulted on this Modification and a total of 5 responses were received. These responses are summarised in Section 5 of this report and the full responses are set out in Annex 4.

Workgroup Conclusions

At the final Workgroup meeting on 14 January 2020 Workgroup members voted on the Original proposal. All members voted that the Original Proposal better facilitated the applicable Grid Code objectives.

Code Administrator Consultation Responses

Four responses were received to the Code Administrator Consultation. A summary of the responses can be found in Section 10 of this document. Overall all respondents agreed that the proposal better facilitates the applicable Grid Code Objectives.

This Draft Self Governance Modification Report has been prepared in accordance with the terms of the Grid Code. An electronic copy can be found on the National Grid ESO website:

<https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0130-oc2-change-simplifying-output-useable>

Terms of Reference

The Grid Code Review 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.

The full term 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	Annex 2
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
eGAMA	Electricity Generator Availability & Margin Analysis. Note re usage: We often refer to the GOAMP part of TOGA with the umbrella term TOGA. As GOAMP will be replaced

	by eGAMA, we will sometimes refer to eGAMA as 'the new TOGA'.
ENTSO-E	European Network of Transmission System Operators for Electricity
ESO	Electricity System Operator
FTP	File Transfer Protocol
GOAMP	Generator Outage and Margin Process. GOAMP is part of TOGA.
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 the umbrella data platform administered by NGESO, which GOAMP is part of.

2 Original Proposal

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

Defect

1. Duplication of data submission under both Grid Code OC2 and REMIT regulation.
2. Data latency and inconsistencies 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.

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-GOAMP; however, this modification will simplify the data submission process such that Generators will be able to submit OC2 data either via REMIT or the recommended NGESO platform.

The Proposer stated that the reasons that the change is necessary are 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 the NGESO recommended platform, eGAMA.

If the change is not made:

- Most Generators will continue to be required to submit duplicate data both to OC2 via the GOAMP part of TOGA and to REMIT.
- Feedback from the industry will have been ignored.
- Data would only be submitted once a day and would 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:

1. Remove the requirement to submit OC2 generator availability and outage submissions in a specific way. As written, OC2 accepts the data in TOGA-GOAMP 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 eGAMA 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 would no longer be required. Generators would 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 the current TOGA-GOAMP system to eGAMA so that in the future they can submit data either via this new platform 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 the recommended NGESO platform.

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 the main source of OC2 data for NGESO.

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

We recognise that there are various platforms available to discharge REMIT obligations. As the majority of REMIT submissions are accessible via ELEXON's BMRS REMIT platform, we are proposing using this as NGESO's preferred platform to source REMIT data.

Whilst the legal text will specify the data requirements, no specific systems will be named in order to future-proof the text. However, should the modification be approved, NGESO will contact all existing TOGA-GOAMP users to inform them of the options available to them. For new users, NGESO will also provide all necessary details of how they can discharge their OC2 obligations.

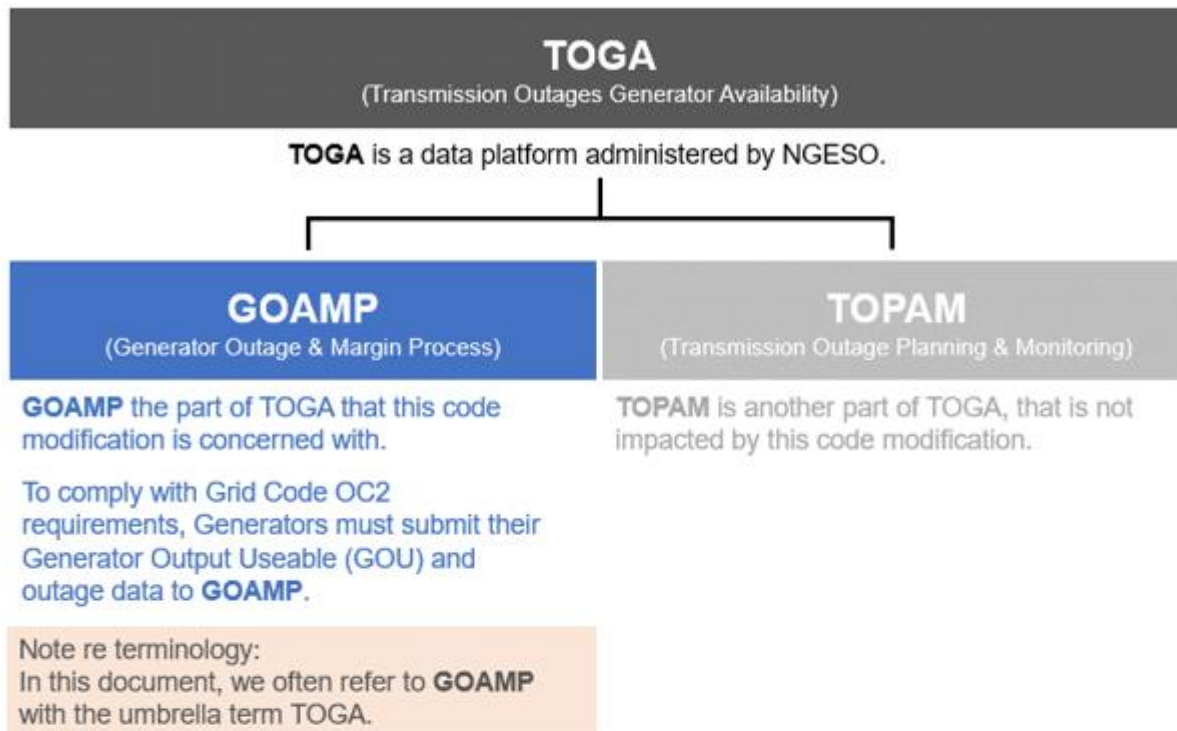
3 Proposer's Solution

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.

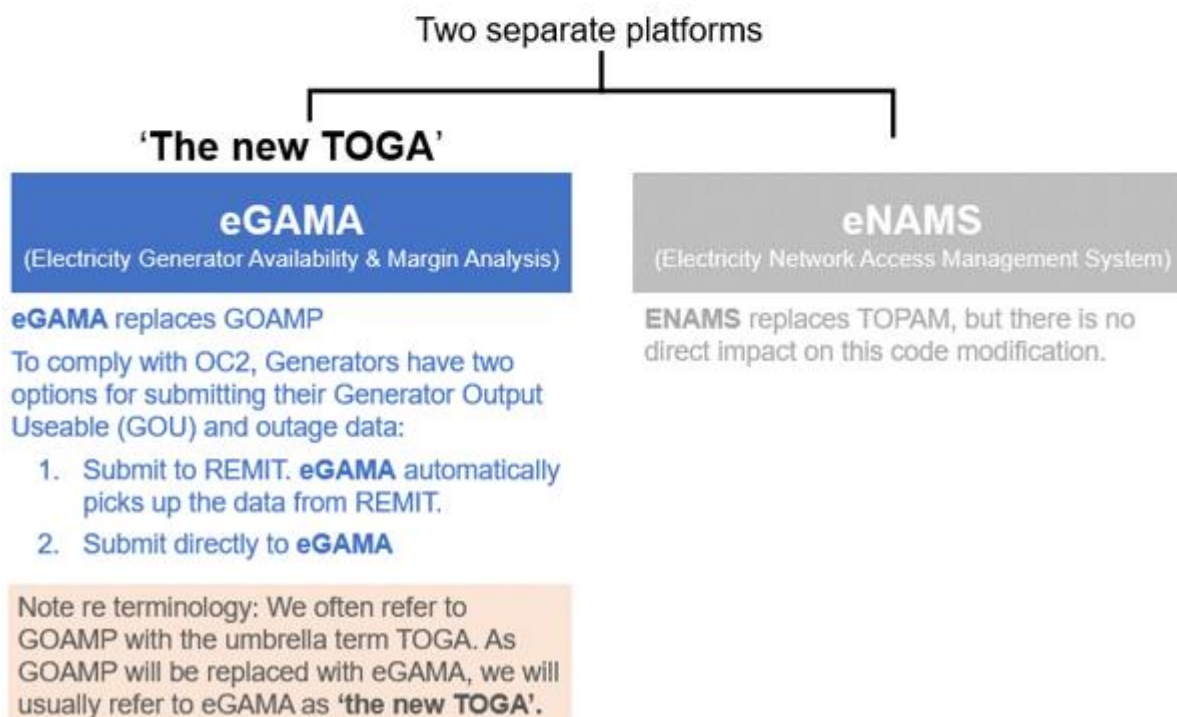
In summary, a new platform will be built to replace the GOAMP part of TOGA, which will be called eGAMA. For simplicity this will be referred to as 'the new TOGA'. Either this new system or REMIT can then be used for OC2 data submissions.

The diagrams below give a high-level view of the system changes that would be made:

1. Current status / As is



2. Proposed Solution / To Be



The new TOGA / eGAMA platform will be set up to accept data with the same frequency and in the same format as current REMIT submissions. The 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 as follows:

In the event that:

- a) a **Generator** referred to in OC2.3.1(a) experiences any unplanned change to the availability of a **Generating Unit** and/or **Power-Generating Module** and/or **Power Park Module** or makes a future plan which would impact the availability of a **Generating Unit** and/or **Power-Generating Module** and/or **Power Park Module** resulting in a change of level in the **Output Usable** of that **Generating Unit** and/or **Power-Generating Module** and/or **Power Park Module** below or above its previously notified availability, which is expected to last one **Settlement Period** or longer and up to three years ahead; or
- b) an **Interconnector Owner** referred to in OC2.3.1(e) experiences any unplanned change to the availability of an **External Interconnection Circuit** or makes a future plan which would impact the availability of an **External Interconnection Circuit** resulting in any change in the **Output Usable** of that **External Interconnection Circuit** below or above its previously notified availability, which is expected to last one **Settlement Period** or longer and up to three years ahead;

The **Generator** or **Interconnector Owner** shall provide **The Company** with the best estimate of the revised available **Output Usable** profile using one of **The Company's** recommended platforms.

For **Generators** subject to EU Transparency Regulations the **Generator** shall provide the data within 1 hour of the unplanned change in availability occurring, and for a planned change to the availability, the **Generator** shall provide the data within 1 hour of planning the availability change in line with EU Transparency Regulations. For **Generators** not subject to EU Transparency Regulations the **Generator** shall provide the data within 24 hours of the unplanned change in availability occurring, and for a planned change to the availability, the **Generator** shall provide the data within 24 hours of planning the availability change.

For an unplanned change in availability, the **Interconnector Owner** shall provide the data within 1 hour of the unplanned change in availability occurring, and for a planned change to the availability, the **Interconnector Owner** shall provide the data within 1 hour of planning the availability change in line with EU Transparency Regulations.

If the **Generator** referred to in OC2.3.1(a) provides information relating to multi-shaft **Generating Units** then the detail of the individual shaft availability levels, that have be summed to produce the **Output Usable** should also be defined.

In the case of an **External Interconnection Circuit**, the details of the individual pole-capacity levels that have be summed to produce the **Output Usable** should also be defined.

The details and benefits of this solution are as follows:

Reduces duplication	Participants who are subject to REMIT data requirements will no longer need to provide data directly to NGESO, as the new TOGA (eGAMA) 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 'output usable' data requirements can either submit data to the new TOGA (in the new format) or submit to REMIT.
Data latency and inconsistencies 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 the new TOGA and REMIT are aligned, meaning that if necessary in the future, participants using REMIT could transfer their submission to the new 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	<p>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 future specified 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.</p> <p>The requirement to submit this will be included in the legal text, however the process details are still to be agreed and will be communicated to Users directly by NGESO once confirmed.</p>

Impact on Participants

The Proposer believes 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-GOAMP will need to change their format of data ready for the new TOGA (eGAMA) 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 is being built (eGAMA).

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	Initial Solution	Revised Solution
	No change to codes or processes	REMIT replaces TOGA for OC2 submission, after an interim period where either can be used	Either eGAMA (the new 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, eGAMA.

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 initial 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 four times to discuss the scope of the proposed defect, devise potential solutions and assess the proposal in terms of the Applicable Grid Code Objectives and review the responses to the Workgroup Consultation.

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

The Proposer presented their modification proposal to the Workgroup and explained that the key purpose of GC0103 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
(This was the initial solution, outlined in the initial Modification Proposal)
3. Only using TOGA for data submission
4. Providing a choice of using REMIT or TOGA for data submission
(This is the revised solution that was developed through the code modification process, and the solution that we are now consulting on as the **'Original'**. This was labelled as 'Revised Solution' in the table above)

The Proposer advised that option 1 (no change) 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-GOAMP 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, a 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 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 revised 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 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 who 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, but will have to still submit data to the new system.

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 OC2 submission requirement to three years to align with REMIT.

At the second Workgroup meeting the Proposer introduced a revised solution, that a new platform will be built to replace the current GOAMP part of TOGA, which will permit Users to submit their OC2 data using either eGAMA, 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 (eGAMA or REMIT or both) if required, therefore providing maximum flexibility to industry when submitting data to NGESO to meet its obligations.

Another element of the revised solution is to allow participants with multi-shaft units to add the shaft level detail into eGAMA 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 between 05 November 2020 and 05 February 2021. A suitable date within this window will be decided jointly between NGESO and ELEXON to align with the standard BSC release (the corresponding BSC modification needs to be submitted at the same time as the Grid Code change). This will allow sufficient time for industry users to make the necessary system changes. ESO will provide industry detailed requirements six months ahead of go-live, to allow sufficient lead time to modify existing systems for the change.

NGESO is working closely with ELEXON on the BSC Mod which is also self-governance. NGESO have defined the requirement changes, keeping file formats the same as current where possible with just the removal of zonal and a new weekly file up to 3 years ahead plus some wording changes. ELEXON are working hard and are aiming for the BSC panel in May 2020. NGESO will work on timing alignment for to go live at the same time, but contingencies are being made if this is not possible.

Timetable for production of the new GOAMP TOGA System is below:

Mod	Activity	Target	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	Detailed Requirements Analysis												
	Detailed Design												
	Solution Build & Development												
	System Testing												
	Business Readiness & Training												
	System Go-Live												

Note:

Implementation is dependent on continued project Sanction into FY20/21

The System Go-Live of November 2020 that is shown above is the targeted earliest Go-Live date, but as indicated elsewhere in this document, NGESO are aiming for an implementation date between 05 November 2020 and 05 February 2021.

Industry experts / stakeholders

The Workgroup discussed whether the right parties were part of the Workgroup. It was agreed that the Workgroup consisted of the correct industry representation, however kept this under review. No additional parties were required to attend workgroup meetings.

5 Workgroup Consultation Responses

The Workgroup met on 14 January 2020 to discuss the five responses received from the Workgroup Consultation which closed on 23 December 2019. The voting of the Workgroup was also held on 14 January 2020. In summary, the key points from the Workgroup consultation responses were;

- All respondents were supportive of the Proposer's solution and believed that it better facilitated the Grid Code Objectives.
- None of the respondents raised an alternative for the Workgroup to consider.
- It was felt that the a more detailed timetable for the TOGA platform would be required.
- The impact on interconnectors needed to be clarified as interconnectors do submit to TOGA and are also subject to REMIT reporting obligations and this needs to be corrected in the consultation document. The legal text has been updated and interconnectors are directly referenced in OC2.4.1.2.1 of the legal text.
- Some of the legal text provided alongside the consultation could be made clearer. In particular, the following text was highlighted by an Interconnector.
 "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 explicitly clear which obligations apply to Generators, which to Interconnector Owners and which to Network Operators.

This could cause confusion and so we would strongly advise that the text is redrafted so make it explicitly clear which obligations apply to Generators, which to Interconnector Owners and which to Network Operators.

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.”

A number of typographical and grammatical errors in the legal text were highlighted for correction.

- An average lead time of 3 to 6 months is required to modify existing systems for the change.

The full suite of Workgroup Consultation Responses is set out in Annex 4 of this Workgroup Report.

6 Workgroup Vote

Workgroup Vote

The Workgroup believe that the Terms of Reference have been fulfilled and GC0130 has been fully considered.

The Workgroup met on 14 January 2020 and voted on:

- Whether the Original would better facilitate the Applicable Grid Code Objectives than the baseline, and;
- Which option was best overall?

GC0130 Workgroup Vote

The Workgroup concluded unanimously (5 out of 5 votes) that the Original better facilitated the Applicable Grid Code Objectives than the baseline and that the Original is the best option overall.

For the avoidance of doubt, the ‘Original’ referred to here is the revised solution discussed in this document.

Workgroup Vote

Vote recording guidelines:

“Y” = Yes

“N” = No

“-” = Neutral

Vote 1 – does the GC0130 Original facilitate the objectives better than the Baseline?

Workgroup Member	Better facilitates AGCO (i)	Better facilitates AGCO (ii)?	Better facilitates AGCO (iii)?	Better facilitates AGCO (vi)?	Better facilitates AGCO (v)?	Overall (Y/N)
Andrew Colley (Alternate for Garth Graham) - SSE Generation Limited						
GC0130 Original	Y	Y	-	-	Y	Y
Voting Statement: The modification will facilitate a more efficient submission of outage data by aligning OC2 data submission requirements with REMIT data submission requirements; and as a consequence, support a single submission of data by obligated Parties, thus improving efficiency. Equally, by maintaining optionality on whether to fulfil OC2 obligations by utilising REMIT submitted data or entering data directly via TOGA, the solution does not impose mandatory participation under the REMIT portal (and potential imposition of costs upon smaller Grid Code Parties that are not obligated to submit REMIT data.						
Jeremy Caplin - Elexon (nominated by National Grid ESO)						
GC0130 Original	Y	Y	Y	-	-	Y
Voting Statement: This modification streamlines the reporting process and so improves efficiency. Zonal and 4-5 year ahead data will no longer be provided, but there is no evidence to suggest that the industry requires this data.						
Robert Selbie (ElecLink)						
GC0130 Original	Y	Y	Y	-	Y	Y
Voting Statement: Aligning the reporting requirements to EU requirements minimises the reporting burden. As such, the proposed modification promotes efficiency in electricity generation, transmission and distribution. Aligning the requirements to the existing EU requirements fosters pan-EU competition in the generation and supply of electricity.						
Alastair Frew – Drax						
GC0130 Original	Y	-	-	-	Y	Y
Voting Statement: This modification simplifies the outage data submission by firstly aligning OC2 outage data requirements to match the REMIT data requirements and then secondly allows the data to only be submitted once via either the TOGA or REMIT portals.						

William Jones – National Grid ESO (Proposer)						
GC0130 Original	Y	Y	Y	-	Y	Y
<p>Voting Statement:</p> <p>This Grid Code modification will allow for the addressing of the main defect identified over duplication but at the same time leave the flexibility for the generators/Interconnectors to still submit direct to the company if they do not wish to submit to the REMIT platform or are not required to do so. It will also allow for more frequent and accurate publishing of data.</p>						

Vote 2– Which option is the best? (Baseline, Proposer solution - GC0130 Original Proposal)

Workgroup Member	BEST Option?
Garth Graham (Andrew Colley as Alternate)	Original
Jeremy Caplin	Original
Robert Selbie	Original
Alastair Frew	Original
William Jones	Original

7 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	Positive

electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);	
(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 inconsistencies and more frequent publishing of reports 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

Pending approval by the Authority, NGESO will 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 the company's recommended platform, eGAMA).

The Proposer confirmed that they were aiming for an implementation date between 05 November 2020 and 05 February 2021. A suitable date within this window was to be decided jointly between NGESO and ELEXON to align with the standard BSC release (the corresponding BSC modification needs to be submitted at the same time to the BSC Panel administered by ELEXON in parallel with the Grid Code change). This was to allow sufficient time for industry users to make the necessary system changes. NGESO will provide detailed requirements as soon as the modification is fully approved hopefully around six months ahead of go-live. An implementation date of 27 November 2020 has now been agreed with ELEXON.

9 Code Administrator Consultation Response Summary

The Code Administrator Consultation was issued on 21 April 2020 for 15 Working Days, with a close date of 13 May 2020.

4 responses were received (Drax Power Limited, National Grid ESO, BritNed Development Limited and National Grid Interconnectors) in response to the Code Administrator Consultation and these can be found in Annex 6 of this report.

On whether or not the Original best met the applicable Grid Code Objectives:

All of the respondents agreed that the Original best met the Grid Code Objectives stating that GC0130 better facilitates the Applicable Grid Code Objectives. The respondents welcomed the efforts made to reduce duplication and that the reporting is to be done for outages.

However, the Interconnectors do not agree with the necessity to publish to New TOGA within 1 hour. Market Parties that do not use ELEXON but another REMIT platform, are obliged to publish transparency data within one hour. The requirement to simultaneously publish to another platform within the same timescale risks adding undue stress to the process.

The Interconnectors believe a longer timeframe to within 24 hours for reporting to New TOGA would be welcomed.

On Implementation:

- Primary concern is that the legal text instead of aligning the OC2 process with the separate REMIT process, instead duplicates the REMIT process. Rather than streamlining the obligations on Grid Code parties it increases them.
- Make it clear that there are two obligations/ processes – REMIT and OC2 reporting procedures which require data in different time frames.
- Other REMIT portals are available such as ENTSOe Transparency platform and therefore the current solution is discriminating against those who choose to discharge their REMIT obligations in other ways.
- There is a potential risk to the IT delivery of this due to the impact of COVID-19, which is impacting some projects and departments and may continue to do so.
- It is important that both modifications (BSC ELEXON and GC0130) are approved as they aim to achieve the same goal, and the changes to the two codes are inter-dependent.

- There needs to be coordination with industry for the implementation to ensure compatible systems are available to parties on all sides.
- Disappointing that National Grid ESO are not initiating a holistic review of outage data submissions and how to streamline them for GB operators. Generators have been calling out for more efficient outage data processes/systems since 2011.

Panel Views

At the Grid Code Review Panel meeting on 28 May 2020, the Panel voted on GC0130 against the Applicable Grid Code Objectives. The Panel members unanimously agreed that the Original was better than the baseline and determined that it should be implemented.

The Proposer requested to make a minor change to the legal text in response to the consultation responses from two interconnectors outlined above. The requirement to provide pole related data would be changed from 'within 1 hour' to 'within 24 hours'. Prior to the Grid Code Review Panel, the Proposer had liaised with the interconnectors, who were supportive of the modification subject to this one change being made. NGESO are the only users of this information and are also content to receive it within 24 hours. The Panel vote was therefore cast on the basis of allowing a five day (working days) cooling off period in order for the Proposer and NGESO to submit this minor change to legal text along with supporting statements from BritNed and National Grid Interconnectors. The Panel reserved the right to change their decision during this cooling off period.

The amended legal text and evidence of the supporting statements from BritNed and National Grid Interconnectors were circulated by the Code Administrator to the Panel for five working days to allow for review and further comments. No further comments were received from Panel within the five day cooling off period.

The supporting statements from the interconnectors can be found in Annex 7.

For reference the Applicable Grid Code Objectives are:

- (a) To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
- (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);*
- (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;*

- (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
- (e) To promote efficiency in the implementation and administration of the Grid Code arrangements.

Vote 1: Does the Original facilitate the objectives better than the Baseline

Panel Member: **Alan Creighton**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	No	Yes	Yes
	Voting Statement					
The modification simplifies the present arrangements and provides a choice of platform available for Users to submit the required data. This statement is based on the assumption that all affected parties agree that the change in the requirement to provide revised notifications for multi shaft Generating Units & Interconnection Circuits in 24 hours rather than 1 hour is considered to be minor and that the revised legal text is circulated to Panel Members.						

Panel Member: **Alastair Frew**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Neutral	Neutral	Neutral	Yes	Yes
	Voting Statement					
This modification simplifies the outage data submission by firstly aligning OC2 outage data requirements to match the REMIT data requirements and then secondly allows the data to only be submitted once via either the TOGA or REMIT portals. Whilst I do note in the Code Administration Consultation responses Interconnector Owners feel this modification does not automatically pick up their REMIT data and they will still have to also submit OC2 data, this situation is caused by the Interconnectors unique status						

which allows them to directly submit their REMIT data to ENTSOe which some have chosen to do, this can only be a GB solution for data held within GB which benefits the vast majority of Users.

Panel Member: **Christopher Smith**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Neutral	Yes	Yes	Yes	Yes
	Voting Statement					
With the provision of additional text from changing 1 to 24 hours then this mod provides advantages to the operation of the grid.						

Panel Member: **Damian Jackman**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Neutral	Yes	Yes
	Voting Statement					
The modification simplifies the submission of generator output data for many participants which will lead to greater efficiency and more accurate data for NGESO to use. By maintaining the option to submit data under the 'new Toga' it retains the option for smaller parties who prefer that route or who do not need to submit REMIT data.						

Panel Member: **Guy Nicholson (Not present for the Vote)**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original						
	Voting Statement					

Panel Member: **Joseph Underwood**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)

Original	Yes	Yes	Neutral	Neutral	Yes	Yes
	Voting Statement					
Approval of GC0130 will not require a market participant to enter duplicate data both to OC2 via the GOAMP part of TOGA and to REMIT. GC0130 will also facilitate more frequent publication resulting in greater accuracy of data.						

Panel Member: **Rob Wilson**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Neutral	Yes	Yes	Neutral	Yes
	Voting Statement					
This modification, in allowing more flexibility for parties to submit data through REMIT or TOGA and to avoid duplication, achieves significant efficiencies. It needs to be approved quickly to allow work on the associated IT changes to commence given that there is a limited window of opportunity while a project team is available to do this. However, this should be on the basis of CAC responses having been reviewed.						

Panel Member: **Robert Longden**

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Neutral	Yes	Yes
	Voting Statement					
The modification provides for more efficient submission of outage data. The retention of optionality does not impose an additional burden on smaller Grid Code Parties.						

Panel Member: **Richard Woodward** (Alternate to Ross McGhin)

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Neutral	Yes	Neutral	Yes	Yes
	Voting Statement					

The modification provides efficiencies to important processes for operating the system safely and avoids risks of duplication in User data submission.

Our vote is made on the assumption that the specific concerns raised in the CAC by Interconnectors, which caused late legal text amendments only made available to us during the Panel meeting, have been adequately addressed. Most importantly, as advised to us at GCRP, we trust that the late legal text changes do not present a materially different solution to that which was shared in advance of the meeting.

We hope that these kind of late changes will not become a regular event for modifications such as this in the future. It is particularly important for Self Governance modifications that Panel members have a complete picture of the proposed changes before making our decisions.

Panel Member: **Graeme Vincent** (Alternate to Steve Cox)

	Better facilitates ACO (a)	Better facilitates ACO (b)?	Better facilitates ACO (c)?	Better facilitates ACO (d)?	Better facilitates ACO (e)?	Overall (Y/N)
Original	Yes	Yes	Neutral	Neutral	Yes	Yes
	Voting Statement					

The proposed modification simplifies the outage data reporting submission by aligning with EU REMIT requirements and removing the need for duplicate reporting. My voting is based on the legal text within the original proposal being amended to reflect the discussions at the panel to reflect the requirement for the additional data required for multi shaft Generating Units and External Interconnection Circuits to be submitted within 24 hours rather than within the 1 hour timeline currently inferred.

Vote 2 – Which option is the best?

Panel Member	BEST Option?
Alan Creighton	Original
Alastair Frew	Original
Christopher Smith	Original
Damian Jackman	Original
Guy Nicholson	Not present for vote
Joe Underwood	Original
Rob Wilson	Original

Robert Longden	Original
Richard Woodward (Alternate to Ross McGhin)	Original
Graeme Vincent (Alternate to Steve Cox)	Original

10 Legal Text

The draft legal text presented to Panel at the Draft Final Self Governance Modification stage can be found in Annex 2(a) of this document. The legal text comprises of OC2 changes (37 pages) and other required Grid Code changes (1 sheet).

The final legal text can be found in Annex 2(b) which comprises the changes requested by the Proposer (Will Jones) and approved by Panel. There are Two versions attached. One shows just the late changes tracked versus the original solution (changes on page 6). The other has all of the original changes tracked, as well as the late changes.

Costs

Code administration costs	
Resource costs	£7,260 - 4 Workgroup meetings £166 - Catering
Total Code Administrator costs	£7,426

Industry costs (Standard CMP)	
Resource costs	£21,780 - 4 Workgroup meetings £8,168 – 2 Consultations <ul style="list-style-type: none"> • 4 Workgroup meetings • 6 Workgroup members • 1.5 man days effort per meeting • 1.5 man days effort per consultation response • 4.5 consultation respondents
Total Code Administrator costs	£7,426
Total Industry Costs	£37,374

Annex 1: GC0130 Terms of Reference

This is the Terms of Reference agreed at the Grid Code Review Panel.

Annex 2: GC0130 Legal Text

The draft legal text presented to Panel at the Draft Final Self Governance Modification stage can be found in Annex 2(a) of this document. The legal text comprises of OC2 changes (37 pages) and other required Grid Code changes (1 sheet).

The final legal text can be found in Annex 2(b) which comprises the changes requested by the Proposer (Will Jones) and approved by Panel. There are two versions attached. One shows just the late changes tracked versus the original solution (changes on page 6). The other has all of the original changes tracked, as well as the late changes.

Annex 3: Proposer's Presentation

This is the original presentation from the Proposer, presented at the first workgroup meeting.

Annex 4: Workgroup Consultation Responses for GC0130

This sets out the Workgroup Consultation Responses received as part of the Workgroup Consultation.

Annex 5: Self Governance Statement GC0130

This is the self-governance statement issued to Ofgem.

Annex 6: Code Administrator Consultation Responses for GC0130

This is the Code Administrator Consultation responses received.

Annex 7: Supporting Statements from Interconnectors

This contains two emails from BritNed and National Grid Interconnectors respectively as supporting statements for the GC0130 proposal.