

Grid Code Administrator Consultation Response Proforma

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

Industry parties are invited to respond to this Code Administrator 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 **17:00** on **13 May 2020** to grid.code@nationalgrideso.com. Please note that any responses received after the deadline or sent to a different email address may not be included within the Final Modification Report to the Authority.

Any queries on the content of the consultation should be addressed to Nisar Ahmed at Nisar.Ahmed@nationalgrideso.com

These responses will be included within the Draft Grid Code Modification Self Governance Report to the Grid Code Panel and within the Final Grid Code Modification Self Governance Report to the Authority.

Respondent:	<i>Sallie Griffiths – sallie.griffiths@nationalgrid.com</i>
Company Name:	<i>National Grid Interconnectors</i>
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	<p><i>For reference, the Applicable Grid Code objectives are:</i></p> <ul style="list-style-type: none">(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

	<p>binding decisions of the European Commission and/or the Agency; and</p> <p>(e) To promote efficiency in the implementation and administration of the Grid Code arrangements.</p>
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Code Administrator Consultation questions

Q	Question	Response
1	<p>Do you believe GC0130 better facilitates the Applicable Grid Code Objectives? Please include your reasoning.</p>	<p>In theory we do agree the concepts which are being applied better facilitate the Grid Code Objectives. Particularly for most market participants the approach will streamline the process and reduce duplication.</p> <p>We also welcome the concept that it is only exception (outage) reporting and not something that has to be inputted on a daily basis if full availability/ capacity is available.</p>

2	<p>Do you support the proposed implementation approach?</p>	<p>Although we agree with the concept of streamlining data we do have some concerns with the changes to the legal text which are being proposed</p> <p>Our 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.</p> <p>We consider a better approach in the legal drafting would be to:</p> <ul style="list-style-type: none"> • Make it clear that there are two obligations/ processes – REMIT and OC2 reporting procedures which require data in different time frames • If the REMIT process satisfies the OC2 reporting process (which is probably true for most market participants) make it clear that they do not need to also carry out the OC2 process within the legal text. Also it needs to be clear in the legal text that where this is the case the NGESO has the obligation to scrape this data from the Elexon portal and that the market participant has no further obligation. <p>We believe that this approach is better than the current drafting. The current drafting places an equivalent obligation on parties to submit OC2 data to NG ESO and REMIT data to an appropriate REMIT reporting portal within 1 hour. For many Users this will be adhered to by their normal REMIT reporting – though we note that if the NG ESO system to scrape data for OC2 purposes fails then legally the User is liable under its Grid Code obligations if it hadn't also provided that REMIT data directly to NG ESO.</p> <p>The current drafting is also unfair to Users such as interconnector owners or multi-shaft CCGT owners who have to provide more information to the OC2 process. Either the User will have to gather more information under its REMIT systems putting it at increased likelihood of failing to meet its REMIT timing obligations, or it will need to make two declarations to REMIT and OC2 each within</p>
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Q	Question	Response
		<p>one hour. We do not believe that the OC2 process needs the information within 1 hour, so we would propose the following for the categories of User for whom additional information for the OC2 process is required.</p> <p>We consider there to be three other types of participant for whom the REMIT process will not completely meet the requirements of the OC2 processes who should therefore continue have an OC2 process to follow. The three categories are:</p> <ul style="list-style-type: none"> • Those who do not have a REMIT obligation • Those who chose to not use the Elexon portal to satisfy their REMIT obligation • Those that use Elexon to do their REMIT obligation but it does not satisfy the OC2 obligation (i.e. multi shaft/ pole) and may require to make separate OC2 submissions. <p>For these participants there still requires to be an OC2 process outlined in the legal text and this process should state that the obligation should be within 24 hours of planning the availability change. This is what it currently states in the text for “those who do not have the REMIT obligation” i.e.</p> <p><i>“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.”</i></p> <p>We believe that this text should be extended to require all three categories of User to additionally report under OC2 the required changes to availability and/or CCGT shaft information or interconnector pole information within 24 hours of the planned or unplanned change in availability.</p>

Q	Question	Response
3	Do you have any other comments in relation to GC0130?	<p>We have two queries surrounding the proposed changes.</p> <ul style="list-style-type: none"> ○ On page 13 of the consultation it refers to finding a solution for those who have to submit multi shaft/ pole information into the OC2 process and that there will be a choice to submit it either directly into OC2 or into the Elexon portal in a certain field and this is still being worked up. This directly affects the IFA interconnector which has to submit OC2 data per bipole and are therefore interested in the solution. <p>As mentioned in the previous section often REMIT messages are raised under a pressurised situation and there is not always full visibility of the individual assets and thus we are interested in the solution you propose to see whether this is something easy to comply with. Our alternative approach to the legal drafting as described in our answer to Q2 above does allow flexibility. Under our approach the REMIT data can be scraped by NG ESO direct from the Elexon REMIT portal, and then within 24 hours of the change the interconnector owner will update the pole level information via the OC2 process.</p> <ul style="list-style-type: none"> ○ The solution only scrapes REMIT data from the Elexon portal whereas other REMIT portals are available such as ENTSOe Transparency platform. We appreciate you are not specifically referring to the Elexon portal, and therefore futureproofing this, but we are concerned that the solution that is currently offered is discriminating against those who choose to discharge their REMIT obligations in other ways.