# GLDPM Consultation Response Proforma

**Consultation on the implementation of the Generation and Load Data Provision Methodology within existing GB framework**

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 to [europeancodes.electricity@nationalgrid.com](mailto:europeancodes.electricity@nationalgrid.com) by **26th January 2017**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the Workgroup.

Any queries on the content of the consultation should be addressed to James Bradley; [james.bradley@nationalgrid.com](mailto:james.bradley@nationalgrid.com)

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| **Respondent:** | *Garth Graham (garth.graham@sse.com)* |
| **Company Name:** | *SSE* |

**Consultation questions**

| **Q** | **Question** | **Response** |
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| 1 | **Do you agree with the position explained in the table above that no further data items are required?** | We do not agree with the statement ‘that no further data items are required’.  This is because the consultation itself makes clear (under ‘data provision framework’ within the Guidance notes) that the ROSA has not been written and therefore “*no detailed data requirements can be inferred*”.  Without this clarity we believe it is impossible for anyone to ‘agree’ to this question.  As we have clearly set out in the (GB) GLDPM mapping workshop discussions held last summer (and in subsequent bi-lateral discussions with National Grid) we fear that whilst the data items themselves may not be ‘new’ or ‘additional’ per se, that there application (as a result of GLDPM) to parties who do not currently provide those data items would mean that, for those parties, it would constitute ‘further data items being required’ from them. |
| 2 | **Do you agree that no other Grid code changes are required to facilitate this process other than to allow the *currently provided* data to be shared?** | We do not agree that no other Grid Code changes are required.  As noted in the consultation, the GLDPM is linked with TSOG and it will be necessary to ensure that the provision of data under these documents is undertaken (i) in a non-discriminatory way and (ii) does not affect cross border trade.  This will require that, for example, if data is required to be provided by the owner of a 10MW generator or 10MW of load anywhere in GB, that all equivalent owners (of 10MW generators or load respectively) provide the same data (and no more, or less) in the same way with the same frequency as all other equivalent plant (or load).  This is not the case today. Differences exist within the Grid Code today in terms of data provisions from identical plant – if not addressed as part of the implementation of GLDPM and TSOG then cross-border trade will be affected.  In addition it will also breach the UK Government’s ‘gold-plating’ policy (“*retaining pre-existing UK standards where they are higher than those required by the Directive*”).  This therefore requires that existing Grid Code data requirements are amended in due course (as part of the GLDPM and TSOG implementation) to ensure that the legality of them is achieved, by ensuring exactly the same data obligations apply to the same network elements anywhere within the GB synchronous area.  We have seen no evidence to date that this matter has been accepted within the implementation arrangements for the EU Network Codes, and in particular CACM (from which GLDPM arises) and TSOG. |
| 3 | **Do you have any other comments on the implementation of the GLDPM?** | We note Ofgem’s letter of 10th January 2017 setting out that they (and the other NRAs) had approved the 13th May 2016 version of the GLDPM (which is the document that is subject to this consultation).  As we have highlighted (i) at the (GB) GLDPM mapping workshop discussions and (ii) the CUSC Panel last summer, a core element of the implementation of the GLDPM is the ‘implementation rules’ to be set by the responsible TSO as, according to Article 4(1), we are obliged to respect those rules when we provide data under the GLDPM.  National Grid advised the industry (via the CUSC Panel) last August, with respect to the implementation rules (in response to questions we posed in July) that:   * *”When will National Grid be preparing these GLDPM implementation rules for GB;*   *This will be addressed in the autumn with a view to have a draft set of rules, developed with stakeholder involvement, ready by January in accordance with the methodology*   * *When will stakeholders be involved in that work;*   *As above, the draft rules will be developed with SH input and are expected to be based as much as possible on existing practices, if formal consultation is required/requested that will be addressed early in the new year”*  We note that, to date, no draft set of the implementation rules have been provided to GB stakeholders – this has impeded our ability to respond to this GLDPM consultation.  Notwithstanding that, we expect (as National Grid stated last August) to be fully engaged (with other stakeholders) in the drafting of the implementation rules in due course. |