Workgroup Consultation Response Proforma

**GC0139: Enhance Planning-Data Exchange to Facilitate Whole System Planning**

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 [grid.code@nationalenergyso.com](mailto:grid.code@nationalenergyso.com)  by **5pm** on **21 January 2025**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact [grid.code@nationalenergyso.com](mailto:grid.code@nationalenergyso.com)

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| **Respondent details** | **Please enter your details** | |
| **Respondent name:** | Alan Creighton | |
| **Company name:** | Northern Powergrid | |
| **Email address:** | alan.creighton@northernpowergrid.com | |
| **Phone number:** | 07850 015151 | |
| **Which best describes your organisation?** | Consumer body  Demand  Distribution Network Operator  Generator  Industry body  Interconnector | Storage  Supplier  System Operator  Transmission Owner  Virtual Lead Party  Other |

**I wish my response to be:**

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| (Please mark the relevant box) | non-confidential *(this will be shared with industry and the Panel for further consideration)* |
|  | **Confidential** (this *will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)* |

**For reference the Applicable Grid Code Objectives are:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *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);*
3. *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;*
4. *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*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**For reference, (for consultation questions 5 & 6) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:**

1. *fostering effective competition, non-discrimination and transparency in balancing markets;*
2. *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
3. *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
4. *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
5. *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
6. *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
7. *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

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| **What is the EBR?** |
| The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.  The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe’s security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem. |

**Please express your views in the right-hand side of the table below, including your rationale.**

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| **Standard Workgroup Consultation questions** | | | |
| 1 | Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives? | Mark the Objectives which you believe the Original Solution better facilitates: | |
| Original | A B C D E |
| Click or tap here to enter text. | |
| 2 | Do you support the proposed implementation approach? | Yes,generally.  No | |
| Consideration needs to the transition from the existing data exchange process to that post the PSM Implementation Date. The sequence of activities for NESO and the Network Operators set out in PC9 and PC10 are the enduring processes and will need to be phased in e.g. for a PSM Implementation Date of 1 Jan 2026, the first CIM based data exchange could be the week 28 submission based on information received from NESO in week 17. It would be unreasonable for the first submission to be the Network Operators week 2 submission, as they would not have received the required information from NESO in the previous week 43. Legal text needs to be developed to clarify that no party would be non-compliant with the Grid Code during the agreed transitional period provided that they were following the agreed transitional arrangements | |
| 3 | Do you have any other comments? | No | |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider? | Yes (the request form can be found in the [Workgroup Consultation](https://www.neso.energy/industry-information/codes/gc/modifications/gc0139-enhanced-planning-data-exchange-facilitate-whole-system-planning) Section)  No | |
| Click or tap here to enter text. | |
| 5 | Does the draft legal text satisfy the intent of the modification? | Yes, see below  No | |
| We have provided detailed comments on the Glossary & Definitions, the Planning Code and the Schedules embedded within the relevant documents. These comments form an integral part of our consultation response. Some of these comments are purely editorial, but others will require some further consideration, particularly in relation to the definition of ‘demand’. | |
| 6 | Do you agree with the Workgroup’s assessment that the modification does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the Code? | Yes  No | |

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| **Specific Workgroup Consultation questions** | | |
| 7 | Do you agree that Option 4 represents to the best solution to providing an enhanced data exchange without a significant increase in the number of forecasting schedules exchanged? | Yes |
| 8 | Adoption of the GSR029 definitions and reporting against these definitions ahead of approval of the GSR029 proposals represents a risk that PC annual exchanges will not be aligned with existing SQSS requirements. Do you agree that the risk is minimal and can be managed with ah-hoc data exchanges? | We are not convinced that the question has been articulated correctly, but in general it seems beneficial to harmonise, as far as possible the definitions (and the underpinning concept of those definitions) emerging from the EREC P2 and GSR029 discussions within this GC0139 Modification, as it should facilitate the adoption of a consistent common approach in terms of assessing the security of distribution and transmission systems. In constructing the data sharing as proposed, we are of the view that this helps make the data exchange futureproof with minimal risk.  We do have some specific concerns about the definition set which we have made in our comments embedded in the draft legal text. |
| 9 | This modification proposal relates to annual planning data exchanges only. The provision of data to support a new connection (PC.4) will remain unchanged and not directly supported with CIM models. This is because the data requirements within PC.4 are not covered by CGMES v3 and would require significant extensions not justified by the benefits. Do you agree with this position of the Workgroup? | The modification relates to period planning data exchanges which would take place twice a year. It is our understanding that this data exchanges would be sufficient for NESO to assess the implications of new demand and generation being connected to distribution systems, without a supplementary data submission such as that associated with a Statement of Works application.  We recognise that where a new Grid Supply Point is being proposed the data exchange would need to comply with PC4, initially at least. Our understanding of is that this would arguably be a widening of the scope of GC0139, and hence a distraction from the present task, rather than because of a limitation of CGMES v3. |
| 10 | Is the delivery timescale of January 2026 to transition to a CIM data exchange methodology reasonable and practically achievable? | Based on our experience with the presentation of LTDS data in a CIM format, the timescale seems very optimistic. We envisage that there would need to be trials of the data exchanges to and from NESO before the PSM Implementation Date to identify and resolve the inevitable implementation issues.  . |
| 11 | Do you envisage that any costs would be incurred to implement these proposals over and above any changes associated with implementing other CIM data exchanges and those associated with the existing data exchanges? | Yes. We anticipate that additional costs, over and above those associated with other CIM data exchanges and existing data exchange processes, will be incurred to implement these proposals. Additional costs are primarily related to the further development of CIM and other new processes for the modified / additional information proposed to be required as part of our week 2 and week 28 submissions. Based on our previous experience with developing CIM in the context of LTDS, the process would take several trial data exchanges and interoperability exercises between NESO and each Network Operator to address potential implementation issues, and require updates to systems for harmonizing data definitions etc. Our estimate is that to update our network models, test the exchanges and compile the additional data would take a minimum of 6-month FTE (excluding activities related to CIM working group participation etc.) |