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:** | Graeme Vincent | |
| **Company name:** | SP Energy Networks | |
| **Email address:** | graeme.vincent@spenergynetworks.co.uk | |
| **Phone number:** | Click or tap here to enter text. | |
| **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 |
| The proposed Option 4 does look to be the most reasonable approach to the objectives. | |
| 2 | Do you support the proposed implementation approach? | Yes  No | |
| Though we believe that the proposed timeline is extremely challenging based on the latest feedback and learning from the Technical CIM working group. | |
| 3 | Do you have any other comments? | Treatment of Large Power Stations could do with additional clarity as currently data relating to these is not included within the Network Operator data submission as per current Grid Code requirements. This data being provided by the Generator separately through their own submission.  One such area requiring further clarification is Group Demand where the proposed definition is “Aggregate import to Embedded Customers’ sites other than to those where the primary purpose is wholly or mainly that of an Embedded Generator” – additional clarity on how this impacts treatment of explicit “Large” power stations in the Week 24 process – both for the CIM modelling and in the schedule data for loading and forecasts – should they be included explicitly or included in the aggregated embedded generation? This could benefit from a diagram similar to the current week 24 guidelines for referencing what the demand figures should account for. | |
| 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  No | |
| Though we have made some additional observations on the proposed legal in the enclosed documents. | |
| 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, as above in (1) |
| 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? | Yes, at least for current requirements |
| 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? | Yes – particularly as a requirement for network operators. Perhaps in future this or similar requirement could be placed on the new connection as part of their application or compliance? |
| 10 | Is the delivery timescale of January 2026 to transition to a CIM data exchange methodology reasonable and practically achievable? | LTDS CIM implementation of the EQ profile only was postponed until November 2025 and so it is not yet clear how successful even that implementation will be. Given the likely additional requirements for the EQ and probable additional profiles we think that January 2026 is extremely ambitious. Without full schema and implementation guidance available it is difficult to say how much additional work this will involve over and above the LTDS implementation. Note also the lead time for software vendors to implement any changes or additions to any schema as well as the implementation of it by DNOs. Could more detailed indication be provided for which CIM profiles are expected and their mandatory objects/classes? If possible showing deviations/additions as compared to the current LTDS GB CIM requirements? |
| 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 | As in answer to (10) – more detail would be required to answer this accurately. Additional work will be required to change existing processes and implement the new requirements – depending on similarity to LTDS CIM requirements the model change requirements could be minimal but at the moment that is not clear. Modelling implementation guidelines and template/example PSM Scenario and Change files would also help to assess this. |