

Stage 04: Grid Code Modification Self-Governance Report

Grid Code

GC0098:

Using GB Grid Code data to construct the EU Common Grid Model in accordance with Regulation (EU) 2015/1222 (CACM), Regulation (EU) 2016/1719 (FCA) and Regulation (EU) 2017/1485 (SOGL).

Purpose of Modification: This modification seeks to give all parties visibility as to which data collected through the Grid Code is to be used to construct the GB Individual Grid Model in accordance with Regulation (EU) 2015/1222 (CACM), Regulation (EU) 2016/1719 (FCA) and Regulation (EU) 2017/1485 (SOGL). A common grid model representing the European interconnected system is to be established so that TSOs can calculate cross-zonal capacity in a coordinated way.

Published on: 3 October 2017

What stage is this document at?

01	Modification Proposal
02	Code Administrator Consultation
03	Draft Grid Code Modification Self-Governance Report
04	Grid Code Modification Self-Governance Report



National Grid's opinion:

GC0098 better facilitates Grid Code Objective (iv) and therefore should be implemented.



Panel Determination:

GC0098 better facilitates the Grid Code Objectives and therefore should be implemented



Low Impact:

Transmission system owners and operators as it is linked to their compliance with the EU network guidelines.

Generators, Independent Distribution Network Operators, Distribution Network Operators, Generation, Interconnectors as data collected from these parties through the GB Grid Code will be used to construct a GB grid model and shared with other EU Transmission System Operators (TSOs).

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Any Questions?

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Proposer:

Robert Selbie

National Grid

Timetable

The Grid Code Panel approved the following table:

Revised Proposal Report presented to Panel	19 July 2017
Code Administrator Consultation Report issued to the Industry (15 Working Days)	27 August 2017
Code Administrator Consultation closes	12 September 2017
Draft Grid Code Self-Governance Report presented to Panel	13 September 2017
Panel Determination Vote	20 September 2017
Final Grid Code Self-Governance Report published	29 September 2017
Appeal window opens (15 Working days)	3 October 2017
Implementation (10 Working Days after closure of appeal window)	8 November 2017

About this document

This is the Grid Code Self-Governance Report which contains the responses to the Code Administrator Consultation and the details of the Panel Determination vote.

This report has been prepared and used by National Grid as Code Administrator under the rules and procedures specified in the Grid Code. The purpose of this document is outline the determination of the Grid Code Modifications Panel on GC0098.

<http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Grid-code/Modifications/GC0098/>

Document Control

Version	Date	Author	Change Reference
1.0	21 August 2017	Code Administrator	Code Administrator Consultation to Industry
1.1	13 September 2017	Code Administrator	Draft Grid Code Self-Governance Report
1.2	3 October 2017	Code Administrator	Grid Code Self-Governance Report

1 Summary

- 1.1 This document describes the GC0098 Grid Code Self-Governance Modification Proposal and contains responses from the Code Administrator Consultation and the Panel Determination vote.
- 1.2 GC0098 was proposed by National Grid Electricity Transmission and submitted to the Grid Code Modifications Panel for their consideration on 30 May 2017. The Panel recommended that the Proposer of this modification amended the legal text provided. The Proposer completed this work and the modification was resubmitted to the Grid Code Panel for discussion on the 19 July 2017. The Panel decided that this Modification should be classed as Self-Governance and should proceed directly to Code Administrator Consultation for 15 Working-Days.
- 1.3 The Code Administrator Consultation closed on the 12 September 2017 and received one response.
- 1.4 This Grid Code 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 Website.

Grid Code Panel Determination

- 1.5 The draft Grid Code Self-Governance Report for GC0098 was presented to the Grid Code panel on 20 September 2017. At this meeting the Panel voted on GC0098; assessing whether it better facilitated the Grid Code objectives. The Panel agreed by majority that GC0098 better facilitates the Grid Code objectives and therefore should be implemented. As GC0098 is a self-governance modification an appeal window has now commenced on this Determination and will close on 20 October 2017. If no successful appeals are received, GC0098 will be implemented on 3 November 2017.

2 Modification Proposal

What

- 2.1 Existing data collected through the Grid Code will be used to construct a GB Individual Grid Model and shared with other EU TSOs. Without this modification it is unclear which data is being used to build the Individual Grid Model. CACM, FCA and SOGL specify confidentiality obligations on TSOs regarding “*information received, exchanged or transmitted pursuant to this Regulation*” in Articles 13, 7 and 12 respectively.

Why

- 2.2 The requirement for TSOs to construct and send an Individual Grid Model is set out in CACM, FCA and SOGL. Without this modification, TSOs will still be obliged to share Individual Grid Models; however GB parties would have little visibility on which data was used to construct these models.

How

- 2.3 The proposed solution is to include a general statement on why the data is to be shared referencing the EU regulations, and then to include an annex where the relevant sections of the Grid Code are listed.
- 2.4 The proposed modification was raised 12 April 2017 was presented by the Proposer to the Panel on 30 May 2017.

The panel requested;

- the legal text was amended to give greater clarity on the type of data items, rather than just the paragraph references.
- clarification on whether the modification included the SOGL Common Grid Model requirements, this has now been included.
- confirmation that merging the Common Grid Model is a SO (rather than TO) responsibility.

- 2.5 The amended modification was presented to panel 19 July 2017. The Proposer of GC0098 amended the legal text as suggested by the Grid Code Panel. In addition, following the July Panel meeting some more wording was added to ensure there is clarity of the modification.

3 Governance

- 3.1 The Proposer of GC0098 put forward that this modification should be considered for **Self-Governance** procedures as the modification is unlikely to have a material effect on any party, but rather gives greater visibility to interested parties on the data used within EU processes. The criteria can be found outlined below:

Self-Governance - *The modification is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:*

- i) Existing or future electricity customers;*
- ii) Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,*
- iii) The operation of the National Electricity Transmission System*
- iv) Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies*
- v) The Grid Code's governance procedures or the Grid Code's modification procedures*

- 3.2 At The Grid Code Panel on the 19 July 2017 the Panel decided that the modification will be treated as Self-Governance. The Code Administrator furnished a Self-Governance Statement to the Authority.
- 3.3 The Panel determination took place on 20 September 2017 the details of this vote can be found in Section 11.

4 Why Change?

4.1 This Proposal is one of a number of Proposals which seek to implement relevant provisions of a number of new EU Network Codes/Guidelines which have been introduced in order to enable progress towards a competitive and efficient internal market in electricity. Some EU Network Guidelines are still in development and these may in due course require a review of solutions developed for Codes that come into force beforehand. The full set of EU network guidelines are;

- Regulation 2015/1222 – Capacity Allocation and Congestion Management (CACM) which entered into force 14 August 2015
- Regulation 2016/1719 – Forward Capacity Allocation (FCA) which entered into force 17 October 2016
- Regulation 2016/631 - Requirements for Generators (RfG) which entered into force 17 May 2016
- Regulation 2016/1388 - Demand Connection Code (DCC) which entered into force 7 September 2016
- Regulation 2016/1447 - High Voltage Direct Current (HVDC) which entered into force 28 September 2016
- Transmission System Operation Guideline (SOGL) - entry into force anticipated Summer 2017
- Emergency and Restoration (E&R) Guideline - entry into force anticipated Autumn 2017
- Electricity Balancing Guideline (EBGL) - entry into force anticipated Autumn 2017

4.2 This modification relates to the CACM, FCA and SOGL guidelines which together aim to; promote effective competition in the generation, trading and supply of electricity, promote effective long-term cross-zonal trade with long-term cross-zonal hedging opportunities for market participants, and determining common operational security requirements and principles.

4.3 The guidelines require National Grid Electricity Transmission plc (NGET) to contribute data towards a pan-EU Common Grid Model (CGM) which will underpin the new European processes. NGET has carried out a mapping exercise with GB industry parties and is confident that we already collect the required data through the GB Grid Code. The legal right for NGET to share the data with EU TSOs arises from the CACM guideline; however several stakeholders have requested a Grid Code Modification be raised so that it is transparent to all parties which data will be shared.

4.4 With reference to the Ofgem decision¹ on the assignment of Transmission System Operator obligations under the Capacity Allocation and Congestion

¹ Decision for our consultations on the assignment of Transmission System Operator obligations under the Capacity Allocation and Congestion Management Regulation within GB

Management Regulation within GB, NGET understands the obligation to merge inputs to form the Common Grid Model (CGM) is an SO obligation. Extract from Annex 2 of the Ofgem decision; “We consider this Sub Paragraph [CACM Article 28.5] applicable to SOs only as it will be the SO’s individual grid models (which they are responsible for the operation of) which are merged to form the common grid model.”

- 4.5 For the avoidance of doubt, the scope of GC0098 is limited to describe the sharing of data between the SO and other EU TSOs. GC0098 does not actually describe the *gathering* of that data from generators. It is noted that other Grid Code modifications (GC0100-GC0103) are currently being developed which may change the data which is currently collected.

5 Code Specific Matters

Technical Skillsets

- 5.1 The Proposer considers that the technical skillset required to assess this modification includes; an understanding of data currently collected by NGET under the Grid Code and an understanding of the common grid processes proposed under CACM, FCA and SOGL.

Reference Documents

Ofgem Decisions on the Generation and Load Data Provision Methodology and Common Grid Model Methodology:

<https://www.ofgem.gov.uk/publications-and-updates/decisions-generation-and-load-data-provision-methodology-and-common-grid-model-methodology>

COMMISSION REGULATION (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management:

http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2015.197.01.0024.01.ENG&toc=OJ:L:2015:197:TOC

Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation Generation and Load Data Provision Methodology (GLPDM) code mapping:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=8589938097>

The draft Regulation establishing a guideline on system operation received a positive vote in comitology on 4 May 2016

<http://ec.europa.eu/energy/en/topics/wholesale-market/electricity-network-codes>

<https://www.ofgem.gov.uk/publications-and-updates/decision-our-consultations-assignment-transmission-system-operator-obligations-under-capacity-allocation-and-congestion-management-regulation-within-gb>

6 Solution

- 6.1 Inclusion of a reference within the Planning Code section of the Grid Code that data collected by NGET through the Grid Code, as specified in a separate Appendix to Planning Code shall be used to build an individual grid model, so that NGET can fulfil its obligations under CACM, FCA and SOGL.

7 Impacts and Other Considerations

- 7.1 No impacts to other codes or processes, modification purely provides greater visibility of processes set out under EU regulations.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No

Consumer Impacts

None

8 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity	None
To facilitate 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)	None
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	None
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
To promote efficiency in the implementation and administration of the Grid Code arrangements	Neutral

9 Implementation

9.1 This is a Self-Governance modification. It will be implemented ten working days following the closure of the 15 day appeal window that opens on 29 September 2017. This modification will therefore be implemented on 3 November 2017 if no successful appeals are received.

9.2 There will be no system changes required to implement GC0098.

10 Code Administrator Consultation Responses

10.1 The GC0098 Code Administrator Consultation closed on 12 September 2017 and received one response. This is summarised below and is provided in full in Annex 1.

Respondent	Do you agree that the GC0098 Proposal better facilitates the Grid Code objectives	Do you agree with the Proposed Implementation?	Do you have any other comments?
Scottish Power Generation Ltd	Yes, as the transfer of this data will be a legal requirement	Yes	I assume the correction to reference for System Operation Guide Line (SOGL) will be carried out once the regulation number is known as an administrative modification and not need to repeat this consultation process.

11 Grid Code Panel Determination vote

Grid Code Panel Determination vote

11.1 The Grid Code Panel met on Wednesday 20 September to vote on GC0098 and assess whether it better facilitates the Grid Code Objectives. The Panel agreed by majority that it better facilitates the objectives and therefore should be implemented. Details of the Panel member's votes are as follows;

Panel Member	(i)	(ii)	(iii)	(iv)	(v)	Overall
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Graeme Vincent	Neutral	Neutral	Neutral	Yes	Neutral	Yes
Alastair Frew	Neutral	Neutral	Neutral	Yes	Neutral	Yes
Alan Creighton	Neutral	Neutral	Neutral	Yes	Neutral	Yes
Fergus Healy on behalf of Kyla Berry	Neutral	Neutral	Neutral	Yes	Neutral	Yes
Damian Jackman	Neutral	Neutral	Yes	Yes	Neutral	Yes
Kate Dooley	Neutral	Neutral	Yes	Yes	Neutral	Yes
Robert Longden	Neutral	Neutral	Neutral	Yes	Neutral	Yes
Guy Nicholson	Neutral	Neutral	No	Neutral	No	No
Steve Cox	Yes	Yes	Yes	Yes	Yes	Yes

11.2 The Panel were also asked to provide a statement with their vote which can be found below:

Graeme Vincent

I believe that the proposal facilitates the implementation of the CACM and SOGL code requirements and will allow TSOs to demonstrate compliance with the codes.

Alastair Frew

This modification allows NGET to comply with European Regulations and does not affect any other users.

Alan Creighton

The proposal increases the transparency relating data used to comply with EU regulations.

Fergus Healy (Kyla Berry alternate)

CACM, FCA and SOGL guidelines require NGET to contribute data towards a pan EU Common Grid Model that will underpin a number of new European processes. NGET already collects the data required via the GB Grid Code and whilst the CACM guideline gives NGET the right to share this data with other European TSOs we have raised this modification to ensure transparency of the data that will be shared. This better facilitate relevant objective (iv) as it will help NGET to efficiently discharge our obligation to comply with the Electricity Regulation and any legally binding decisions of the EU Commission.

Damian Jackman

I support this modification.

Guy Nicholson

I voted against this modification because I received last minute stakeholder feedback on this consultation concerned that detailed and commercially sensitive IP data that is necessary for a connection design and assessment would be made available on a European level when a) this granular data is far too detailed to be used in a macro European model and b) it exposes confidential IP to unnecessary increased risk of leaking to competitors, and industrial espionage.

Robert Longden

I support this modification

12 Legal Text

PC2 .1(f)

(f) to provide for the supply of information required by NGET from Users in respect of the pan-EU Common Grid Model (CGM) and to enable NGET to carry out its duties under Regulation (EU) 2015/1222, Regulation (EU) 2016/1719 and Regulation (EU) 2017/1485 [SOGL]. Details of the information which may be transferred is given in Appendix G.

...

APPENDIX G

All data items collected under the following sections of the Grid Code may be used by NGET to fulfil the obligations under Regulation (EU) 2015/1222, Regulation (EU) 2016/1719 and Regulation (EU) 2017/1485 [SOGL];

Physical Notifications, Export and Import Limits, Bid-Offer Data, Dynamic

Parameters,

BC1.4.2

BC1.A.1.1

BC2.5.1

Grid Voltage Variations, Plant Performance Requirements, Control Arrangements, System Ancillary Services, Commercial Ancillary Services

CC.6.1.4

CC.6.3.2

CC.6.3.7

CC.8

Generation Planning Parameters, Generator Performance Chart, Final Generation Outage Programme, Genset inflexibility, Outages Adjustments, EU Transparency Availability Data, Test And Monitoring

OC2

OC2.4.1.2.1

OC2.4.1.2.2

OC2.4.1.3.2

OC2.4.1.3.3

OC2.4.2.1

OC2.4.7

OC5

OC6.6

Standard Planning Data, Detailed Planning Data, Power Park Unit model, Single Line Diagram, Lumped System Susceptance, Reactive Compensation Equipment, Power Factor of the Power Park Module, production type, Busbar Arrangements, Registered Capacity, Output Usable, Minimum Generation, Rated Parameters Data, General Generating Unit Power Park Module and DC Converter Data, primary source of power, demand and active energy data, User's User System Demand (Active Power) and Active Energy Data, Connection Point Demand (Active and Reactive Power), Post Fault User System Layout, General Demand Data, Synchronous Generating Unit Parameters, Non-Synchronous Generating Unit and Associated Control System Data, Transient Overvoltage Assessment Data, User's Protection Data, Harmonic Studies, Voltage Assessment Studies, Short Circuit Analysis

PC.4.3.1

PC.A.5.4.2

PC.A.2.2

PC.A.2.2.2

PC.A.2.2.4

PC.A.2.2.5

PC.A.2.2.6

PC.A.2.3

PC.A.2.4

PC.A.2.5.6

PC.A.3.1.4

PC.A.3.1.5

PC.A.3.2.2

PC.A.3.3.1

PC.A.3.4.1

PC.A.3.4.3

PC.A.4.1

PC.A.4.1.4.2

PC.A.4.2

PC.A.4.3

PC.A.4.3.1

PC.A.4.3.2

PC.A.4.3.3

PC.A.4.3.5

PC.A.4.5

PC.A.4.7

PC.A.5.2

PC.A.5.2.1

PC.A.5.3.2

PC.A.5.4.2

PC.A.5.4.3.1

PC.A.5.4.3.2

PC.A.5.4.3.3

PC.A.6.2

PC.A.6.3

PC.A.6.4
PC.A.6.5
PC.A.6.6

Text Commentary

A reference in the Planning Conditions of the Grid Code and a list in a separate annex of all sections in the Grid Code where the relevant data is collected through.

Annex 1 – Code Administrator Consultation responses

Grid Code Code Administrator Consultation Response Proforma

GC0098 Using GB Grid Code data to construct the EU Common Grid Model in accordance with Regulation (EU) 2015/1222 (CACM), Regulation (EU) 2016/1719 (FCA) and Regulation (EU) 2017/XXXX (SOGL).

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 by **5pm on 12 September 2017** to Grid.Code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

Respondent:	Alastair Frew
Company Name:	ScottishPower Generation Limited
Please express your views regarding the Code Administrator Consultation, including rationale. (Please include any issues, suggestions or queries)	

Code Administrator Consultation questions

Q	Question	Response
1	Do you believe that GC0098 better facilitates the Grid Code objectives? Please include your reasoning.	Yes as the transfer of this data will be a legal requirement.
2	Do you support the proposed implementation approach? If not, please provide reasoning why.	Yes

3	Do you have any other comments?	I assume the correction to reference for System Operation Guide Line (SOGL) will be carried out once the regulation number is known as an administrative modification and not need to repeat this consultation process.

Annex 2 – Self-Governance Statement

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25 July 2017

www.nationalgrid.com

Reference: GC0098 Self-Governance Statement

Dear Gurpal

This is the Grid Code Modifications Panel's Self-governance Statement to the Authority for Grid Code Modification Proposal GC0098. National Grid Code Administrator has prepared this Self-governance Statement on behalf of the Grid Code Modification Panel and submits it to you in accordance with the Grid Code.

On 19 July 2017 the Grid Code Modification Panel considered GC0098 and confirmed unanimously that it meets the Self-governance criteria.

As such, GC0098 is unlikely to discriminate between different classes of Grid Code Parties and is unlikely to have a material effect on:

- i) Existing or future electricity customers;
- ii) Competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution or supply of electricity,
- iii) The operation of the National Electricity Transmission System
- iv) Matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies
- v) The Grid Code's governance procedures or the Grid Code's modification procedures

The proposed timetable for the progression of GC0098 is as follows:

11 July 2017	Grid Code Modification Proposal submitted
19 July 2017	Proposal presented to Grid Code Modification Panel
27 July 2017	Code Administrator Consultation issued
17 August 2017	Code Administrator Consultation closes

12 September 2017	Draft Final Modification Report issued to Panel
20 September 2017	Draft Final Modification Report presented to Panel
20 September 2017	Panel Determination vote
29 September 2017	Final Modification Report published
29 September 2017	Appeal window opens
20 October 2017	Appeals window closes
3 November 2017	Implementation (10 Working days after appeal window closes)

The GC0098 form is available at;

<http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Grid-code/Modifications/GC0098/>

If you require any further information please do not hesitate to contact me.

Yours Sincerely,

Chrissie Brown
Grid Code Modification Panel Secretary