

## Grid Code Workgroup Consultation Response Proforma

### GC0106 Data exchange requirements in accordance with Regulation (EU) 2017/1485 (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 27 April 2018** to [grid.code@nationalgrid.com](mailto: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 by the Workgroup.

Any queries on the content of the consultation should be addressed to Chrissie Brown at [Christine.brown1@nationalgrid.com](mailto:Christine.brown1@nationalgrid.com)

<b>Respondent:</b>	<i>Alan Creighton</i>
<b>Company Name:</b>	<i>Northern Powergrid</i>
<b>Please express your views regarding the Workgroup Consultation, including rationale.</b>  <b>(Please include any issues, suggestions or queries)</b>	<p><i>For reference, the Grid Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity</li> <li>ii. 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)</li> <li>iii. 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</li> <li>iv. 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</li> <li>v. To promote efficiency in the implementation and administration of the Grid Code arrangements.</li> </ul> <p><i>The Distribution Code objectives are:</i></p> <ul style="list-style-type: none"> <li>i. Permit the development, maintenance, and operation of an efficient, coordinated and economical System for the distribution of electricity.</li> <li>ii. Facilitate competition in the generation and supply of electricity.</li> <li>iii. Efficiently discharge the obligations imposed upon DNOs</li> </ul>

	<p>by the Distribution Licence and comply with the Regulation (where Regulation has the meaning defined in the Distribution Licence) and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators.</p> <p>iv. Promote efficiency in the implementation and administration of the Distribution Code.</p>
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### Standard Workgroup Consultation questions

Q	Question	Response
1	Do you believe that GC0106 Original proposal, or any potential alternatives for change that you wish to suggest, better facilitates the Grid Code Objectives?	Yes
2	Do you support the proposed implementation approach?	Yes
3	Do you have any other comments?	It would be helpful if, following the completion of this Modification Proposal, NGET were to review the DG data requested from DNOs in Schedule 11 (per GSP), Schedule 11 (GC0042 DG >1MV) and the new information forming this GC0106 proposal. The purpose of such a review would be to clarify the information that NGET require and to ensure consistency between the three data submissions. Harmonisation would help DNOs to structure their generation databases and provide consistency in reporting e.g. how to treat a Small Power Station >1MW with multiple energy sources such as PV and Battery.
4	Do you wish to raise a WG Consultation Alternative Request for the Workgroup to consider?	No

### Specific GC0106 questions

Q	Question	Response
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5	<p>For those respondents that the Workgroup believes are directly affected by the GC0106 proposal (i.e. (i) new Type A power generating modules of less than 16A per phase, (ii) DNOs and (iii) CDSOs) do you agree with the proposed revised data exchange requirements? Do you have any comments on the drafting of the associated legal text set out in Annexes 4, 6 and 7?</p>	<p><b>Comments on Annex 4 – Grid Code text</b></p> <p>1 The proposed new text in PC. A 1.2 (a) (i) should be supplemented with the additional words underlined:</p> <p><u>In addition the structural data in DRC Schedule 5 provided by calendar week 28 shall be updated and provided by Network Operators in week 50 of each year (again which may be delayed as above until week 2 of the following calendar year)</u></p> <p>Schedule 5 (page 10 of 10), in part (c) of the Short Circuit Analysis section requires that demand and short circuit data is provided in a DNO week 24 schedule 5 submission. The DNO week 24 Schedule 5 templates include fault level and demand data. We understand that the intent of the DCC Art 43-3 is that the DNO only needs to provide an update of the structural data; the purpose of the additional words above is to clarify this intent.</p> <p>However given that ‘structural data’ is not a defined Grid Code term, this might not be sufficiently clear and it may be necessary to :</p> <ul style="list-style-type: none"> <li>a) Define structural data;</li> <li>b) Include the list of structural data items from Art 43 in the text above; or</li> <li>c) Draft the text to refer explicitly to the parts of the GCode that require the individual components of the Schedule 5 data e.g. line data, transformer data etc.</li> </ul> <p>2 The proposed new text in PCA 3.1.4. (iii) should be replaced with :</p> <p><u>(iii) beginning from the 2019 Week 24 data submission, for <b>Embedded Power Stations</b> with <b>Registered Capacity</b> of 1MW or less, their best estimate of the aggregated capacity of all such <b>Embedded Power Stations</b> per production type as defined the list in PC.A.3.1.4 (a)(ii)(2)(a).</u></p> <p>The above text clarifies the requirement and also that the DNOs are required to provide their best estimates of the aggregated capacity in accordance with DCC Article 43 - 5.</p> <p>3 The proposed new Schedule 11 should be</p>
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		<p>included in the proposed changes to the Grid Code. Our understanding is that the proposal is as per the schedule below.</p> <p>The proposed reference to 'Network Operator Unique Reference Number' should be deleted. We assume that this has been carried over from the current Schedule 11 GC0042 table, but doesn't have a meaning for aggregated generation capacities.</p>
6	Do you believe that the solution described in this Workgroup Report discharges the legal obligations of the SOGL and other relevant EU legislation?	Yes
7	For those parties that the Workgroup believes are not directly affected by the GC0106 proposed revised data exchange requirements, do you have any comments on the approach and/or legal drafting?	N/A
8	Do you have any views on the legal interpretation aspects set out in Section 9 together with the explanatory information in Annexes 2 and 3?	We believe that the interpretation provide and used to form this Modification is reasonable.
	<b>Legal text comments</b>	
	<b><i>If you believe there are issues in the legal text, can you please bring these to our attention by using the space provided here. These will then be discussed at the GC0106 Workgroup meetings planned following the closure of this Consultation.</i></b>	Please see our response to Question 5 above.

Schedule 11 Embedded Small Power Stations <1MW			
Date			
Network			
Operator			
Network Operator Unique Ref. No.			
Fuel Type	Aggregate Registered Capacity Total MW	Number of PGMs	Comments
Biomass			
Fossil brown coal/lignite			
Fossil coal-derived gas			
Fossil gas			
Fossil hard coal			
Fossil oil			
Fossil oil shale			
Fossil peat			
Geothermal			
Hydro pumped storage			
Hydro run-of-river and poundage			
Hydro water reservoir			
Marine			
Nuclear			
Other renewable			
Solar			
Waste			
Wind offshore			
Wind onshore			
Other			