Grid Code Data Exchange Working Group

Briefing Note

Introduction

1. The Grid Code Data Exchange Working Group has been established to identify an enduring solution to the inefficient interaction between the STC and Grid Code regarding the exchange of User data.

Background to Existing Provisions

- 2. Schedule 3 (Information and Data Exchange Specification) of the STC specifies the User data that is permitted to be exchanged from National Grid (as GB System Operator) to Scottish Power Transmission (SPT) and Scottish Hydro Electric Transmission (SHETL) as the Transmission Owners (TOs). At the time of BETTA Go-Live a specific reference to this version of the STC (and associated Schedule 3 provisions) was placed in the Grid Code¹. As such any amendments proposed to Schedule 3 of the STC, with respect to the exchange of User data, would require a consequential amendment to the Grid Code.
- 3. It had been accepted by the GCRP that the current provisions does not provide the most effective and efficient solution in terms of alleviating User concerns regarding the exchange of their data and making the best use of the code governance frameworks.

Data Exchanged

- 4. The Grid Code User data transferred to the TOs, comprises of the information collected under the Week 24 submissions and data required to assess CUSC application forms.
- 5. The data exchange is necessary to ensure that National Grid and the TOs are planning investment on their systems on the basis of a consistent set of data and thereby meeting their licence and 1989 Electricity Act obligations to develop and maintain an efficient, coordinated and economical system of electricity transmission.
- 6. Users have expressed concerns about the appropriateness of the STC to dictate the User information which can be exchanged between National Grid and the TOs. Users have indicated their preference that control over this exchange should be reflected in User facing Codes such as the Grid Code.

Possible Solutions

- 7. The Working Group discussed various solutions which would potentially enable the necessary data exchange between National Grid and the TOs whilst ensuring that Users can easily understand which Parties are using their data. The Working Group agreed that the final solution should ideally not involve parallel obligations in more than one Code.
- 8. The potential solutions were categorised into two groups: code governance processes and formal code changes. Each potential solution was dependent by the Working Group in turn, the debate focusing on the pros and cons of each solution.

Code Governance Process

- 9. The preferred code governance process solution is the closer alignment of the STC and Grid code amendments process. The Working Group acknowledged that it may be possible and beneficial to align the STC and Grid Code amendments processes closer together via the existing governance framework but queried whether this solution delivered the assurances that Users were seeking in the context of adequate monitoring of the exchange of their data between National Grid and the TOs.
- 10. The proposal also had limitations in that the details of the User Data to be exchanged would not be described in the Grid Code but remain in the STC. The Working Group

¹ Information Exchange under the STC – Ofgem conclusions (March 2005) – Paragraph 3.33

noted that the proposal was flexible but would rely on significant cooperation between all Parties without the arrangements being reinforced in a User facing Code.

Formal Grid Code Codification

- 11. The preferred codification solution is the development and inclusion of new provisions within the Grid Code which would specify the User data being exchanged to the TOs for the purposes of transmission investment activities.
- 12. By having the data items highlighted in the Grid Code, it would be transparent to all Users which User data items are being transferred to the TOs. Any subsequent changes to the User data being transferred would necessitate a formal change to the Grid Code; Users would have an opportunity to fully debate and to inform the debate of the proposed changes in accordance with existing Grid Code governance.
- 13. The solution would alleviate Users concerns regarding User data being exchanged between National Grid and the TOs in terms of the visibility of data being exchanged and also enabling Users to have an activity role in the development of any subsequent changes.
- 14. The Working Group notes that this proposal may necessitate consequential changes to the STC, Schedule 3 in particular, such that it is reflective of the Grid Code provisions regarding data exchange.

Way Forward

- 15. The Working Group preferred solution is for the Grid Code to specific the User data being exchanged to the TOs for the purposes of transmission investment activities and for the associated legal text will be developed and reviewed/agreed by the Working Group prior to the conclusion of the Working Group discussions.
- 16. Given the current interaction between the STC and Grid Code, it is the Working Group preference that the proposed amendment processes to industry consultation in a timely manner.
- 17. The GCRP is invited to note the Working Group discussions and preferred solution. The Working Group recommendation will be presented at May 2008 GCRP.

Appendix 1 – Terms of Reference

Terms of Reference

It was agreed at the Extraordinary Grid Code Review Panel (GCRP) meeting on 31st July that a GCRP Working Group would be established and tasked with identifying an enduring solution to the interaction between the STC and Grid Code.

The terms of reference for the working group are:

- 1. Review the investment planning data requirements and current code provisions/obligations
- 2. Consider the interaction between the STC and Grid Code provisions, in particular:
 - a. the cross governance issues
 - b. whether the existing change coordination provisions are sufficient
- 3. Identify and consider the nature/content of the data exchange provisions and where the obligation(s) would be best situated
- 4. Identify and consider an enduring solution which will fulfill the necessary obligations and minimise any cross governance issues
- 5. Recommend changes required to the Grid Code
- 6. Identify consequential changes which may be required to other industry codes

Working Group Members

Members GCRP Working group will be as follows:

<i>Chair</i> Duncan Burt	National Grid	Secretary Richard Dunn	National Grid

National Grid Representatives Lilian Macleod John Zammit-Haber

Industry Representatives	
Sigrid Bolik	Econnect Consulting Ltd
Paul Jones/Claire Maxim	E.ON
Alan Michie	Scottish Power Transmission Ltd
Jim Molley	Scottish Hydro Electric Transmission Ltd
John Morris	British Energy
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Authority Observer Bridget Morgan

Ofgem