Issue Log

This document represents the combined issue logs from the JESG, ECCAF and the DECC-Ofgem Stakeholder Group.

ID	Topic	Issue	Update	Source
1.	CBA Methodology	The Cost Benefit Analysis methodology considers socio-economic often on a pan-European basis. There is a concern this will lead to one member states constantly subsidising another member state, or one market party being unduly affected (such as GB merchant Interconnectors).		JESG generic issue log
2.	Data Flows	There are various data and information flows defined in various Network Codes which are not obviously consistent. This remains a major concern for the Industry due to changes to processes and infrastructure that will be required to provide this data.		JESG generic issue log
3.	Definitions	There are various different terminologies for geographic areas used in the Network Codes. It is not obvious what each definition refers to and this leads to confusion. Examples are bidding zone, control area, responsibility areas, observability area, LFC control area, member state etc.		JESG generic issue log
4.	GB Framework implications	Further details of the modification process for GB Codes as a result of the ENCs need to be defined, for example, who will raise modifications, can alternatives be proposed etc.		ECCAF Application / Implementation Issues Log
5.	GB Framework implications	The industry may not have sufficient resource to make the scale of the changes required to the GB Codes.	This is a high impact risk, and all industry parties should consider how application can be done in the most efficient method possible to reduce the burden where possible.	ECCAF Application / Implementation Issues Log
6.	GB Framework implications.	Handling of definitions in GB where the European set keeps changing.	How will the GB Codes handle the changing landscape of European definitions. A mechanism to align GB definitions to EU definitions may be required.	ECCAF Application / Implementation Issues Log
7.	Market Interactions	Alignment of requirements and payment. There is a need to ensure that requirements specified in one Network Code, and the payment mechanisms outline in the Balancing Network Code are aligned so that services are delivered recompensed on the same timescales.		JESG generic issue log

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8.	Market Interactions	The contractual / market impact of demand side response for domestic customers has not been considered. The DCC and LFR&C Network Codes both deal with capability without outlining how the market will work in practice. Who is the most appropriate party in the UK to have a relationship with the customer for demand side response.		JESG generic issue log
9.	Market Interactions	Supplier may be moved to an 'out of balance' position by demand actions taken by the Aggregator / DSO / TSO. This impact on the balancing arrangements will need to be considered.		JESG generic issue log
10.	Network Code Amendment process	Can the final Network Code to be produced be used to correct errors / inconsistencies in earlier Network Codes?		JESG generic issue log
11.	Obligation on Network Operators	What happens when notifications are provided to the TSO / Relevant Network Operator. Does the TSO have a duty to act upon the notifications? What if they do not comply?		JESG generic issue log
12.	Regulatory Approval	There should be a general clause in each of the Network Codes to require consultation and NRA approval for elements which are to be defined after the Network Code has entered in to force. Such a condition has been included in the CACM Network Code.		JESG generic issue log

Closed Issues

The following issues are considered 'closed'. In most cases, the network code development process has moved on and an explanation or understanding has been reached and summarised below. If you feel any of these should remain open, please contact europeancodes.electricity@nationalgrid.com.

These issues will not be recorded in the JESG Headline Report.

ID	Topic	Issue	Update	Source
B1.	Code Structures	How do the Network Codes align with the individual Framework Guidelines?	**Grid Connection FWGL**: RFG, DCC, HVDC **CACM FWGL**: CACM, FCA **Balancing FWGL**: Balancing **System Operation FWGL:** OS, OPS, LFCR, ER	JESG generic issue log
B2.	Code Structures	How is consistency and interoperability being ensured across the Network Codes?	The first network codes adopted set precedence. The later network codes will need to be consistent with the earlier codes.	JESG generic issue log

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B3.	Definitions	How do the definitions in the Transparency Regulation, expected to become law as an Annex to Regulation 714/2009 prior to any Network Code, interact with those in the Network Codes? Do the definitions in the Transparency Regulations have primacy over those in the Network Codes?	Once published in the OJEU, the definitions became law. The Transparency Regulation have been published are Regulation 543/2009 amending Annex I of Regulation 714/2009. Future network codes will have to accept the definitions from earlier network codes, including Regulation 714/2009 and the Transparency Regulation	ECCAF Application / Implementation Issues Log
B4.	Definitions	The potential for different definitions of significant across Network Codes	The scope in each code should be clear as a result of changes made in comitology.	JESG generic issue log
B5.	Definitions	There are different definitions for 'Significant Grid User' in a number of the Network Codes, so the applicability of the Network Codes to individual users is not clear.	The scope in each code should be clear as a result of changes made in comitology.	JESG generic issue log
B6.	Definitions	If the term 'Transmission Connected' is used within the Network Codes this will led to discrepancies within Europe and within the UK, and there is no single voltage above which Networks are considered Transmission (e.g. within GB, Transmission in Scotland is at or above 132 kV, whilst in England and Wales it is at or above 275 kV)	The defininiton of transmission and distribution in GB will not change as a result of the network codes.	JESG generic issue log
B7.	Definitions	Common definitions. A working group has been established by ENTSO-E to look at definitions across the Network Codes. It is understood that while common definitions are desirable the same term could be defined differently in different Network Codes. Consideration is be to be given to the establishment of a separate cross-codes definitions document.	The first network codes adopted set precedence. The later network codes will need to be consistent with the earlier codes.	JESG generic issue log
B8.	GB Framework	Implementation: Can areas of the GB Network Code be changed to comply with the ENCs be modified through the normal GB governance arrangements, provided it does not affect compliance with the ENCs?	Governance arrangements of GB Codes are not expected to change by implementing the ENCs. However, GB must demonstrate consistency with the ENCs or risks being found in breach and infracted.	ECCAF Application / Implementation Issues Log
B9.	GB Framework	How will the changes to the GB Framework be made as a result of the Network Codes, for example, will existing structures (panels etc.) be used where possible, or will third package powers be used to make changes via the Secretary of State?	It is expected that existing standard Code Governance will be used where possible, however, Ofgem have powers to make changes to the GB Codes to ensure compliance with European legislation.	ECCAF Application / Implementation Issues Log
B10.	GB Implementation	The implementation of the RfG could conflict with CACM as they are at different stages in the Network Codes process	This is an inherent feature of the of the ENC development process which is outside of control of GB. Mitigation will be considered during the GB implementation phase.	JESG generic issue log

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B11.	GB TSO structure	The definition of TSOs in the Network Code may lead to ambiguity due to the certification of additional companies in GB as TSOs (e.g. Interconnectors and OFTOs)	This is being managed by Ofgem as part of national implementation.	JESG generic issue log
B12.	Network Code Amendments	What is the expected frequency for changes to the Network Codes once implemented? The minutes of the Operational Security Network Code Public Workshop (20/4/12) indicate that a 'frequency of 4-5 years' 'might be needed'.	ACER have illustrated an amendment process which includes a regular 5 yearly amendment process, as well as an ad-hoc process. It is not yet finalised.	JESG generic issue log
B13.	Overall needs case	What is contribution of each Network Code to resolve issues? Need a strategic view of the Network Codes but not sure which is the best place to do this.	Please refer to the Framework Guidelines and the ENTSO-E supporting documents	JESG generic issue log
B14.	REMIT	Concerns over the mechanism for the publication of data under REMIT	REMIT is now implemented in Europe.	JESG generic issue log
B15.	Stakeholder Engagement	Consideration by Ofgem to be made on whether to reconvene the former FUI (France-UK-Ireland) regulatory group, or potentially set up a new GB regulatory balancing group, as a means to engage with stakeholders.	A Stakeholder group has been established under the JESG to consider the implementation of the Balancing Network Code.	JESG generic issue log