

Stage 01: Modification Proposal

Grid Code

GC0106:

Mod Title: Data exchange requirements in accordance with Regulation (EU) 2017/1485 (SOGL)

Purpose of Modification: This modification seeks to make changes to data exchange requirements in the Grid Code arising from the EU regulation SOGL to ensure compliance.

The Proposer recommends that this modification should be: assessed by a Workgroup to form the final proposals

This modification was raised **12 October 2017** and will be presented by the Proposer to the Panel on **18 October 2017**. The Panel will consider the Proposer's recommendation and determine the appropriate route.



High Impact: *Independent Distribution Network Operators, Distribution Network Operators, Interconnectors and Transmission owners (incl OFTOs) and GB NETSO are all potentially impacted*



Medium Impact: *Distribution connected Generators, Demand response and reserve providers and Interconnectors are potentially impacted*



Low Impact: *Transmission connected Generators and demand Customers*

What stage is this document at?

01	Modification Proposal
02	Workgroup Report
03	Code Admin Consultation
04	Draft Final Modification Report
05	Report to the Authority

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Any Questions?

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Timetable

The Code Administrator recommends the following timetable: *Recommended that this is scoped out at the initial Workgroup meeting*

Workgroup Meetings - number of meetings required to be scoped out within initial Workgroup meeting	
Workgroup Consultation	
Workgroup Report issued/presented to Panel	
Code Administration Consultation Report issued to the Industry	
Draft Final Modification Report submitted/presented to Panel	
Grid Code Panel Recommendation Vote	
Final Modification Report issued the Authority	
Decision implemented in Grid Code	
Deadline in SOGL	<i>EIF+18m (14/03/2019)</i>

1 Summary

What

Data exchange provisions that already exist in the Grid code need to be modified to ensure that they are in line with the data exchange requirements listed in EU regulation 2017/1485 also known as SOGL (System Operation Guideline). Additionally this Regulation requires the creation of a pan-European proposal on the Key Organisational Requirements, Roles and Responsibilities (KORRR) for data exchange across Europe to be developed by all TSOs. This document may subsequently require some additional changes and/or new requirements to be added to the GB Grid code. This will be considered by the workgroup in parallel as this pan-European document is developed. It is anticipated that the Operational Code (OC), the Planning Code (PC) and Data Registration Code (DRC) are the relevant sections of the GB Grid code that are most likely to be impacted. A code mapping exercise was carried out with GB stakeholders on the requirements of SOGL and how these mapped to the existing GB frameworks.

Why

Guidance from BEIS and Ofgem¹ was to apply the new EU requirements within the existing GB regulatory frameworks and using the existing governance processes. This would provide accessibility and familiarity to GB parties, as well as putting in place a robust governance route to apply the new requirements in a transparent and proportionate way.

SOGL entered into force on 14th September 2017 and as such all countries of the European Union need to comply with it. Within this regulation there is a title concerned with data exchange requirements (articles 40-53) which is what this modification proposal is focused on. This section has a specific timeline for implementation which is 18 months after it 'entered into force' which is 14th March 2019; this is the timescale that this modification needs to be implemented by.

How

In line with Ofgem advice, this modification will make only those changes necessary to the relevant industry documents to ensure compliance with the European codes and guidelines. So in this case, only the necessary changes to existing data exchange provisions in the Grid code will be made to ensure GB is compliant with the requirements detailed in SOGL and will also propose any new provisions that may be required resulting from the pan-European KORRR.

When

As already mentioned the Data Exchange section of SOGL has a specific time lime that means it applies 18 months after entry into force (EIF), so by 14/03/2019. The all-TSO KORRR proposal is required 6 months after EIF which is 14/03/2018 and then has 6 months approval period ending in September 2018, before then applying along with the rest of the Data Exchange section as explained above. As this is a major dependency, the modification proposal will be running in parallel with the development of the KORRR so that as and when this is available it will allow for the maximum implementation time.

¹ <https://www.ofgem.gov.uk/ofgem-publications/92240/openletteronimplementationandconsultationonnewdesignations.pdf>

2 Governance

This modification should be subject to Authority decision as it may have a material impact on several different classes of parties; it should also be considered in parallel with the pan-European data exchange agreement (KORRR) by the Authority as this is a major dependency.

Requested Next Steps

This modification should: be assessed by a Workgroup

Note that some preliminary work was already done under the previous GC0095 SOGL stakeholder engagement workgroup as part of an overall SOGL assessment and mapping and it is anticipated that previous members of the GC0095 workgroup are likely to wish to continue this engagement.

<http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Grid-code/Modifications/GC0095/>

3 Why Change?

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) - which entered into force 14 September 2017**
- Emergency and Restoration (E&R) Guideline - entry into force anticipated Autumn 2017
- Electricity Balancing Guideline (EBGL) - entry into force anticipated Autumn 2017

This modification is required as part of the implementation of SOGL which as a whole aims to determine common operational security requirements and principles which will ensure security of supply whilst enabling cross border exchanges and the single energy market.

Specifically, in SOGL, the data exchange requirements under the heading of Title 2, which is Articles 40 – 53, sets out a common framework for data exchange between parties in order to ensure operational security during planning timescales and close to real time. Additionally Article 40, paragraph 6, requires an all-TSO

pan-European proposal on Key Organisational Requirements, Roles and Responsibilities (KORRR) relating to data exchange to be developed. This proposal will set out how these data exchanges will be organised and determined particularly in relation to different parties' roles and responsibilities.

Therefore this section of SOGL, Articles 40-53 will form the scope of work this modification will seek to address. Whilst there are links to other sections of SOGL that are important to understand they will be out of scope. Other Modifications (if required) will be raised in due course to address other sections of SOGL that may entail changes to the GB codes.

4 Code Specific Matters

Technical Skillsets

An understanding of data currently collected by NGET under the Grid Code (sections OC, PC & DRC) and an understanding of the data exchange requirements proposed under SOGL (Articles 40-53). Previous experience of working in GC0095 is beneficial but not essential.

Reference Documents

COMMISSION REGULATION (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation:
<https://publications.europa.eu/en/publication-detail/-/publication/d09a428c-8957-11e7-b5c6-01aa75ed71a1/language-en/format-PDFA1A> Specifically articles 40-53

Pan-European proposal on Key Organisational Requirements, Roles and Responsibilities (KORRR) in accordance with article 40, paragraph 6 of SOGL
(as yet unpublished, link to be updated when available)

5 Solution

Previous assessment undertaken in GC0095 determined that the only definitive change required *[at the time of understanding]* was to make changes to the process for submission of (offline or 'static') network data from users to move it from an annual process to a 6 monthly cycle. This is in respect to SOGL article 43, paragraph 4.

<http://www2.nationalgrid.com/UK/Industry-information/Electricity-codes/Grid-code/Modifications/GC0095/>

Other more minor changes may be necessary and will be identified by the workgroup through the course of a detailed assessment and code mapping of the KORRR once it becomes publically available.

Other changes may be necessary resulting from the reserve requirements section of SOGL. If possible within the required timescales this will also be in scope, otherwise this may be implemented separately through other modifications due to

differing timelines. This is because this is largely dependent on the work relating to reserve dimensioning and reserve provider’s pre-qualification requirements which are being addressed through the Synchronous Area Operational Agreement (SAOA)

6 Impacts and Other Considerations

So far it is understood that this proposal will impact the submission process of users’ network data in regards to the frequency but not the content or scope of data submitted.

Certain data provision requirements are dependent on other areas of work that stem from the different sections of SOGL, namely reserve services. The specific requirements in relation to this will be dependent on the outcome of this workstream that is organised under the “Synchronous Area Operation Agreement”.

As already mentioned this proposal is also dependent on the pan-European KORRR.

There are other indirect links to Coordinated Security Analysis (CSA) work under SOGL, for which another modification proposal will likely be raised in the near future and will endeavour to work in parallel as much as possible to best understand this link.

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

No.

Consumer Impacts

No.

7 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	Positive
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	Positive
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

8 Implementation

To be completed when concrete changes and impacts are better understood, e.g. if material changes are necessary to data provision processes sufficient leadtime and planning may be necessary to allow parties to comply by the deadline of SOGL EIF+18 months.

9 Legal Text

So far one concrete text modification has been identified and proposed below, although more are likely to be needed.

PC.A.1.2

Submissions by Users

(a) Planning data submissions by **Users** shall be:

(i) with respect to each of the seven succeeding **Financial Years** (other than in the case of **Registered Data** which will reflect the current position and data relating to **Demand** forecasts which relates also to the current year);

(ii) provided by **Users** in connection with a **CUSC Contract** (PC.4.1, PC.4.4 and PC.4.5 refer);

(iii) provided by **Users** on a routine ~~annual~~ **6 monthly** basis in calendar week 24 ~~and week 50~~ of each year to maintain an up-to-date data bank (although **Network Operators** may delay the submission of data (other than that to be submitted pursuant to PC.3.2(c) and PC.3.2(d)) until calendar week 28 ~~or week 2~~). Where from the date of one ~~annual~~ submission to another there is no change in the data (or in some of the data) to be submitted, instead of re-submitting the data, a **User** may submit a written statement that there has been no change from the data (or some of the data) submitted the previous time; and

(iv) provided by **Network Operators** in connection with **Embedded Development** (PC.4.4 refers).

Further text changes are likely to be necessary and will be proposed in due course once identified.

Text Commentary

The aim of the modified text is simply to change the submission cycle from annually to 6 monthly for static network data in accordance with article 43, 4).

10 Recommendations

Panel is asked to:

- Agree that this modification will have a material impact and therefore should be submitted to the Authority for a decision.
- Refer this proposal to a Workgroup for assessment.