Making a positive difference
for energy consumers

Joseph Henry
Frameworks Officer
National Grid ESO
Faraday House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Date: 28 January 2021

Dear Joseph,

Authority view on amending the Implementation Date of GC0130 in the Grid Code

I refer to National Grid Electricity System Operator's (NG ESO) letter to us[1] dated 22 January 2021 requesting Grid Code modification proposal GC0130, *OC2 Change for simplifying 'output useable' data submission and utilising REMIT data*, implementation date be changed from 2 February 2021 to 18 March 2021. We note that we previously agreed to NG ESOs request, dated 30 October 2020, to change the implementation date of GC0130 from 27 November 2020 to 2 February 2021.

GC0130 was proposed by NG ESO following industry feedback, and seeks to simplify the process for generators to submit Generator Output Useable (GOU) and outage data to NG ESO and to reduce duplication in the data submission process. This data is required under Grid Code Operational Code no.2 (OC2), which prescribes that it must be submitted in Transmission Outages Generator Availability - Generator Outage and Margin Process (TOGA-GOAMP) format but not that submitted under Regulation on Wholesale Energy Markets Integrity and Transparency (REMIT). Currently many generators are required to submit the data via both channels resulting in duplication. The changes will allow the data, as required under OC2, to be submitted via either REMIT, or a new NG ESO platform Electricity Generator Availability & Margin Analysis (eGAMA), which replaces TOGA-GOAMP.

[1] References to "Ofgem", "the Authority", "we", "us" and "our" are used interchangeably in this letter. The Authority is the Gas and Electricity Markets Authority. Ofgem is the Office of the Authority.

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU **Tel** 020 7901 7000
www.ofgem.gov.uk

This data is used by NGESO to calculate National Output Usable, as well as Margin and Surplus data which is published on the Balancing Mechanism Reporting Service (BMRS) as required by Section Q of the Balancing and Settlements Code (BSC). As part of GC0130, some additional data will be published, and other data that is not widely used by industry will no longer be published.

GC0130 interacts with BSC Modification P408, *Simplifying the Output Usable Data Process as a consequence of GC0130*, also proposed by NG ESO. P408 seeks to remove the obligations on NG ESO to publish data that is no longer mandated to be published by the Grid Code and add obligations to publish the new data. It will also simplify the obligations around the existing data.

It was agreed by the Grid Code Review Panel (GCRP) and the BSC Panel (BSCP) respectively, that GC0130 and P408 should be treated as self-governance modifications. GC0130 was approved with an implementation date of 27 November 2020 at the GCRP meeting on 28 May 2020 and P408 was approved with an implementation date of 3 December 2020 at the BSCP meeting on 9 July 2020.

Further delays to the delivery of NG ESOs IT solution facilitating the modifications mean the amended implementation date, 2 February 2021, is unfeasible. NG ESO state that this further delay arose as it took longer than anticipated to enable connectivity of systems with ELEXON[2] for full end to end testing as a result of technical complexities not understood until the point of implementing the change, and when testing more complex scenarios, too many data related issues were found. NG ESO have engaged with ELEXON and agreed a new implementation date of 18 March 2021 for both modifications. This will allow NG ESO to complete more comprehensive testing and contingency time to resolve any problems encountered.

The GCRP approved the revised implementation date of 18 March 2021 on 22 January 2021, via email. The BSCP approved the revised implementation date of 18 March 2021, via email, following NG ESOs letter to the BSCP on 20 January 2021 requesting the implementation of P408 be delayed.

We agree with NG ESO that there is no compliance risk in delaying the implementation of the modifications. We have no objection to the implementation date of GC0130 being revised to 18 March 2021.

[2] Elexon manage the Balancing and Settlement Code.

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU **Tel** 020 7901 7000
www.ofgem.gov.uk

We note that NG ESO accepts that missing the agreed implementation date is not acceptable and has offered to provide a more in-depth explanation at the GCRP and BSCP. The implementation of GC0130 and P408 has been delayed twice due to delays to the delivery of NG ESOs IT solution facilitating the modifications, we therefore consider the delays should be reviewed and lessons learned taken on board to ensure such IT complexities are understood and accounted for in future delivery targets.

Yours sincerely,

Peter Bingham
Chief Engineer, Systems and Networks
Signed for and on behalf of the Authority

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU **Tel** 020 7901 7000
www.ofgem.gov.uk