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Dear Industry Colleague and/or Market Party,

Consultation on the implementation of the Generation and Load Data Provision Methodology within existing GB framework

In accordance with Article 16 of Regulation (EC) 2015/1222 on Capacity Allocation and Congestion Management (the “CACM Regulation”), the Generation and Load Data Provision Methodology (GLDPM) was proposed by ‘All TSOs’ on 14th June 2016 and is currently being considered for approval by all regulatory authorities. Once approved, which is expected early 2017; the GLPDM will become binding European legislation. The GLPDM sets out data provision requirements from network users that Transmission System Operators (TSOs) need to carry out the new Common Grid Model process as set out in the accompanying proposal; the Common Grid Model Methodology (CGMM) in accordance with Article 17 of Regulation (EC) 2015/1222.

The impact of the GLPDM on GB parties was investigated by the industry led Joint European Stakeholder Group (JESG) CACM and FCA subgroup. A detailed code mapping exercise was undertaken to assess whether the GLDPM requirements were already met under the existing GB framework (Grid Code, BSC, etc.) This assessment determined that no additional data items were required to meet the GLPDM requirements. Data already collected from network users subject to the Grid Code will be used to construct the GB individual grid model and hence a *Grid Code modification may be required* to ensure this data can be shared with other European TSOs. This provisional position has been taken in consultation with the attendees of the JESG sub group and Ofgem and is summarised in the table below;

Who is impacted?

DNOs, Generators – transmission connected and potentially some embedded (see guidance notes), transmission connected demand users, potentially providers of DSR

What is the perceived impact?

Low or none – the provisional conclusion reached is that all necessary data requirements in the GLDPM are already present in the Grid code. We may need to make provision in the Grid code that would allow the sharing of this data as required by the European network codes.

Why do we think this?

The purpose of the GLDPM is to ensure TSOs receive the data they need in order to build a compliant common grid model (see guidance notes on article 3.1). It is believed that the existing data provision requirements in the Grid code are sufficient (see accompanying spreadsheet for documented references).

We would now like to invite all other interested parties to review the position above in conjunction with the code mapping analysis. Accordingly, this consultation will run from 19th December 2016 and remain open for responses until COB on 26th January 2017. Please refer to the mentioned documents which can be accessed [here](#). Please send all responses using the supplied pro-forma by e-mail to europencodes.electricity@nationalgrid.com and please quote “GLDPM consultation” in the subject line. We ask interested parties to answer the specific questions below;

1. Do you agree with the position explained in the table above that no further data items are required?

2. Do you agree that no other Grid code changes are required to facilitate this process other than to allow the *currently provided* data to be shared?

3. Do you have any other comments on the implementation of the GLDPM?

Unless respondents request otherwise, responses may be made public. Respondents should clearly mark any part of their response (or the whole response), which is to remain confidential. When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of an organisation, please state which organisation and, where applicable, how the views of the members were collated.

Subject to the above confidentiality point, following receipt of responses the TSOs will prepare a summary of the responses received and publish this via an update on the website. A revised (if necessary) position on the implementation of the GLDPM will then be made public, and if necessary discussed in detail in a dedicated workshop. Subsequently any changes to GB framework will then be initiated, within the usual industry governance and regulatory oversight.

If you have any queries, please contact James Bradley on +44(0)118 9363814 or on james.bradley@nationalgrid.com.

Yours sincerely,

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Guidance notes

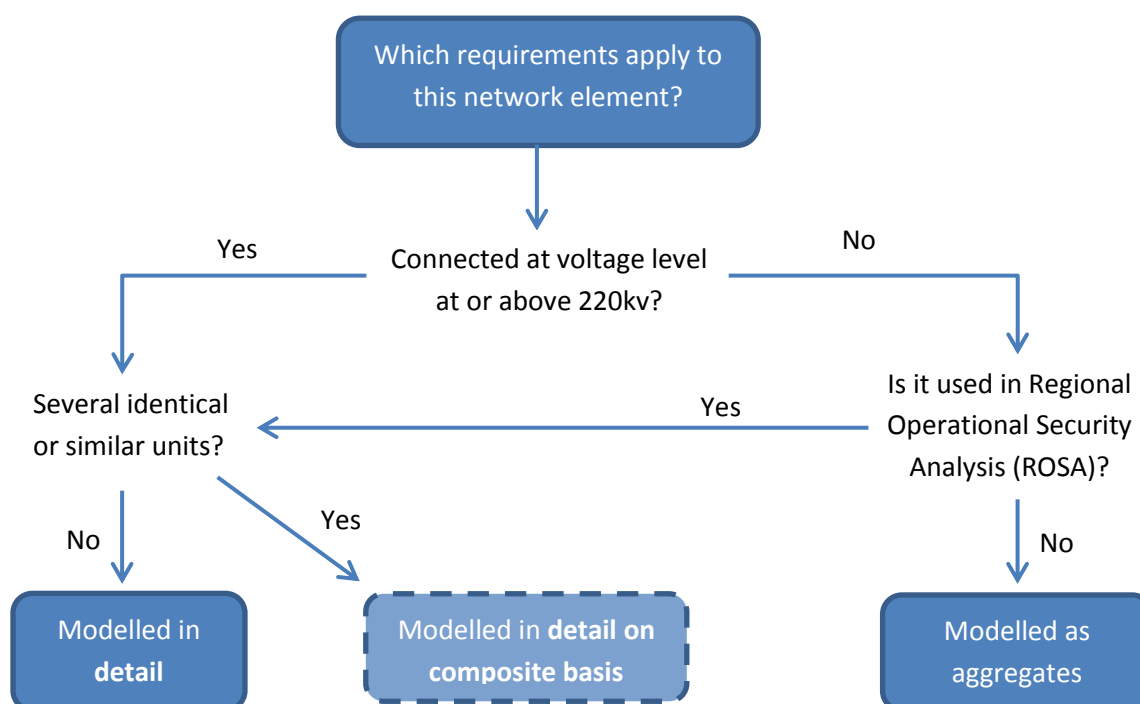
In order to help users understand the GLDPM, its structure and the framework it proposes for collecting data, the following guidance notes have been produced.

Document Structure;

Apart from the general provisions the GLDPM is organised by the party each set of requirements is addressed to, and then by what kind of data is being required. The articles are broadly grouped as follows; Distribution System Operators (DSOs), Generation, Loads, HVDC

Data provision framework;

In order to understand which obligations apply to which users it is necessary to understand the general criteria that is applied in the GLDPM. Generally speaking the requirements are split into two main groups depending on whether the respective network element (be it piece of network, generator, loads etc.) is modelled either in *detail* or in *aggregate*. Some basic questions are used in to determining which group the network element is in, this process is illustrated below in a decision tree. One of these questions is whether or not it is used in Regional Operational Security Analysis (ROSA). The ROSA has not yet been written. This will be produced through the Transmission System Operation Guideline (TSOG) implementation. As this criteria is unavailable, no detailed data requirements can be inferred. This will be re-evaluated in when the ROSA is available.



Generation may be modelled in detail, on a composite basis. For example a wind farm may be modelled as a single generator even if in reality it is composed of many similar individual units.

Key points:

Article 3.1 clearly sets out the intention and mechanism by which the GLDPM is to be used as a means for collecting data *“Each TSO shall have the right but not the obligation to obtain these data...”* Therefore the data provision requirements in the GLDPM are not mandatory unless needed by the TSO in a clear and demonstrably justified way. The process of doing this is explained in the section on *“Timescale for implementation”* (18) and this is what this consultation is driving towards; a clear and well understood implementation. That same section (3.1) also clearly says that if the necessary data is already available to the TSO by some other means than no additional data provision is necessary (or justified).

The scope of data collected under the GLDPM is clearly explained as being only for the purposes of building an individual grid model (IGM) in order to participate in the CGM process. Data required for other reasons are out of scope of this methodology (3.9).

Responsibility for providing data is proposed as resting on the owner of the corresponding network element(3.4) but it does allow for this responsibility to be delegated (3.5). It proposes that DSOs are responsible for providing data on load and generation modelled in aggregate (8.3).