

Stage 03: Report to the Authority

Grid Code

H/11 Data Validation, Defaulting and Consistency Rules

What stage is this document at?

01 Working Group Report

02 Industry Consultation

03 Report to the Authority

This proposal seeks to modify the reference, contained in the Glossary and Definitions of the Grid Code, which refers to the Data Validation, Consistency and Defaulting Rules document. The reference refers to Issue 7, dated 11th October 2004. The Data Validation, Consistency and Defaulting Rules document has recently been updated and thus the Grid Code reference needs to be updated to reflect the new Issue number and effective date.

The purpose of this document is to assist the Authority in its decision of whether to implement the proposed Grid Code Modification.

Published on: 7th February 2012



National Grid recommends:

That H/11 is implemented as it better facilitates the Applicable Grid Code Objectives (i) and (iii)



High Impact:

None identified



Medium Impact:

None identified



Low Impact:

All users of the Grid Code

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About this document

This document is the Report to the Authority for H/11 which contains the responses to the Industry Consultation and the National Grid recommendation. The purpose of this document is to assist the Authority in their decision whether to implement the H/11 proposed changes.

The revisions to the Grid Code proposed by National Grid and sent to the Authority require approval by that body and will, if approved, come into force on such date (or dates) of which Authorised Electricity Operators will be notified by National Grid, in accordance with the Authority's approval.

The Annexes for H/11 are in a separate document and can be found on the National Grid website:

http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/current/H_11/

Document Control

Version	Date	Author	Change Reference
0.1	30 January 2011	National Grid	Draft Report to the Authority
1.0	07 February 2012	National Grid	Final Report to the Authority



Any Questions?

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National Grid Electricity
Transmission

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1 Executive Summary



- 1.1 Balancing Mechanism data submitted by Trading Agents and BM (Balancing Mechanism) Control Points is subject to validation and consistency checks.
- 1.2 The rules governing these checks are contained in an Associated Grid Code document titled *Data Validation, Consistency & Defaulting Rules*. This document defines the validation and consistency checks which are applied to the data received; it also covers defaulting rules to be applied in the absence of expected data. The current version of this document is version 7 dated 11th October 2004.
- 1.3 The Grid Code references the *Data Validation, Consistency and Defaulting Rules* document along with the version number and date issued. Changes have been made to the *Data Validation, Consistency & Defaulting Rules* document which has resulted in a new version 8 dated 25th January 2012.
- 1.4 H/11 proposes changes to update the references within the Grid Code to the new version of the *Data Validation, Consistency & Defaulting Rules* document. H/11 was proposed by National Grid and submitted to the Grid Code Review Panel for their consideration on 17th November 2011. The Panel determined that the proposal should progress to Industry Consultation.
- 1.5 The H/11 Industry Consultation was published on 28th November 2011 for 20 business days. Along with the H/11 Industry Consultation, an informal consultation to seek views on the *Data Validation, Consistency & Defaulting Rules* changes was also published. This additional consultation is considered informal as it does not sit under Grid Code governance.
- 1.6 Both consultations closed on the 28th December 2011, after a 20 day consultation period. Two broadly supportive responses were received which related to both consultations.

National Grid Recommendation

- 1.7 National Grid supports the implementation of H/11 as it better facilitates the Applicable Grid Code Objectives (i) and (iii).
- 1.8 Applicable Grid Code Objective (i) is better facilitated as the change would reference an updated *Data Validation, Consistency and Defaulting Rules* document. The document has been updated to promote more efficient despatch of BM Units.
- 1.9 Applicable Grid Code Objective (iii) is better facilitated as H/11 will ensure that BM instructions will only be issued to those BM Units with an EDL (Electronic Dispatch Logging) connection. Issuing multiple instructions through manual means (i.e. telephone instruction) is, at times, impractical and potentially detrimental to system security.

H/11 Consultation

The formal consultation asked for views on updating the reference to the *Data Validation, Consistency and Defaulting Rules* document contained in the Grid Code. The informal consultation asked for views on the actual changes proposed to the *Data Validation, Consistency and Defaulting Rules* document.

2 Why Change?



Data Validation, Consistency and Defaulting Rules

This document defines the rules for data validation and consistency checking which are applied to Balancing Mechanism data received from trading agents and control points. It also covers the defaulting rules to be applied in the absence of expected data. The document forms one of the Grid Code associated documents and can be located on the National Grid website:

<http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/associateddocs/>

2.1 National Grid has identified a number of changes that are required to the Data, Validation, Consistency and Defaulting Rules document. The informal consultation issued alongside H/11 proposed these changes. In summary the changes identified were:

- Insertion of an additional validation rule. The effect of the additional validation rule would be such that Bid Offer data can only be submitted by BM Units which have an EDL connection;
- Insertion of an additional section into the document. This new section specifies the initial values for a newly registered BM Unit. These values can then be changed as required by an appropriate party; and
- Changing the default value of parameter, N from a value of 239 minutes to 59 minutes.

2.2 Following the informal consultation a number of additional changes have been made to the Data Validation, Consistency and Defaulting Rules document. Some of these additional changes have been made in response to the informal consultation responses, with changes also being made to further improve the clarity of the document.

Reason for proposed changes

2.3 The Grid Code requires those wishing to participate in the Balancing Mechanism (BM) to have EDL (Electronic Dispatch Logging) installed, National Grid have encouraged participation in the BM by accepting Bid Offer Data from generators without EDL (whilst they continue to progress its installation). This interim mechanism is effective for low levels of despatch.

2.4 Recent experience of high wind conditions has evidenced that issuing multiple despatch instructions through manual means (i.e. telephone instruction) is impractical due to the time taken to issue a BOA and is detrimental to system security. Following a review of events during high wind conditions it had been concluded that this interim arrangement of manual despatch, for parties without EDL, should cease.

2.5 In order to assist with the implementation of this policy going forward it is proposed that an additional validation rule is applied to Bid-Offer data, such that Bid-Offer data can only be submitted, in respect of BM Units, via an EDL connection. This validation rule is consistent with the Grid Code BC1.4.2(d):

*"...**Bid-Offer Data** may not be submitted unless an automatic logging device has been installed at the **Control Point** for the **BM Unit** in accordance with CC.6.5.8(b)."*

2.6 In addition to the new data validation rule proposed above, two other changes were identified that could provide further clarity to the existing validation rules:

- At present, the Data Validation, Consistency and Defaulting Rules document does not specify what the initial value for each submitted data parameter will be for newly registered BM Units. These initial values can be updated at a later date by Trading Points / Control Points as required. It is proposed to insert an additional section into the document (Section 6) specifying the initial values for each data item (to avoid null fields).

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- Section 1.3 of the Data Validation, Consistency and Defaulting Rules document specifies definitions and abbreviations used in the document. One such definition is for the value of N which is defined as “A parameter used for some of the following validation rules – initially set to 239”. This parameter is used in the validation of NTO (Notice to deliver offers) and NTB (Notice to deliver bids) submitted data. The second validation rule for NTO and NTB states: “The field “NTO value” cannot be null and must be an integer greater than or equal to 0 minutes and less than or equal to N minutes” and “The field “NTB value” cannot be null and must be an integer greater than or equal to 0 minutes and less than or equal to N minutes”. The value of N in the document was not amended when one hour gate closure was introduced; it is proposed that the value of N is amended to 59.

3 Solution

Informal Consultation

3.1 This section summarises the changes made to the *Data Validation, Consistency and Defaulting Rules* document. These changes were consulted on as part of the informal consultation.

3.2 Under Section 3.6 of the document (Valid Bid-Offer Data) an additional validation rule has been inserted as follows:

Bid Offer Data can only be submitted in respect of BM Units which have an EDL installation.

3.3 Insert an additional section into the document (section 6) which specifies the initial values for a newly registered BM Unit. Section 6 is shown below:

When a BM unit is first registered with Elexon and setup, by NGC, within the BM a set of initial values for each of the submitted data items is given. These values are used in the absence of a submission from the responsible Trading Point/Control Point.

The following values are used for the following data types:

- MEL, PN, QPN, MIL, SEL, SIL, MZT & MNZT are all zero.
- Bid-Offer Volume, Bid Price and Offer Price are all zero for all initial settlement periods up to the end of the next Operational Day.
- RURE, RDRE, RURI & RDRI is 10.
- MDP is 1
- MDV is 99999
- NDZ, NTO & NTB is 2

3.4 Change the value of parameter N, from an initial 239 to 59 (Section 1.3 Definitions and Abbreviations).

3.5 The changes to the Data Validation, Consistency and Defaulting Rules document described in 3.2 and 3.3 above are the final proposed changes. They have been subject to minor modifications following comments made in the informal consultation.

3.6 Following the informal consultation and in response to consultation comments a number of additional changes have been made to the Data Validation, Consistency and Defaulting Rules document. Section 5.8 (Default Rules for Bid Offer Data) has seen the introduction of a new rule (D_BOD_2):

Day ahead bid-offer data may be submitted for every BMU by 11:00 local time. If no bid-offer submission, or a partial submission, has been made by 11:00 then a single Bid-Offer Pair with zero prices and zero Bid-Offer Volume will be used to fill the periods where no submission has been received for the next Operational Day.

3.7 The rule above will only be applied to BM Units without EDL. The rule is intended to avoid a situation where a BM Unit (which has existing Bid-Offer data within the BM system) but is not planning on installing EDL, has the existing data carried forward rather than zero values.



Annexes

The H/11 Annexes are contained in a separate document and can be found on the National Grid website:

http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/current/H_11/

3.8 The *Data Validation, Consistency and Defaulting Rules* document has had outdated pages removed, general formatting changes, and text deletions / additions. A change marked (note formatting changes are not shown) *Data Validation, Consistency and Defaulting Rules* document is attached as Annex 3 in the separate document issued with this report.

Formal Consultation

- 3.9 H/11 seeks to implement the proposed changes identified in Annex 1.
- 3.10 H/11 proposes to update the reference to the *Data Validation, Consistency and Defaulting Rules* document, contained within the Glossary and Definitions section of the Grid Code. If the modification is approved, both the version reference and date will need to be updated.

4 Impact & Assessment

Impact on the Grid Code

4.1 If approved modification H/11 requires amendments to the following parts of the Grid Code:

- Glossary and Definitions

4.2 The text required to give effect to the proposal is contained in Annex 1. The H/11 Annexes are contained in a separate document and can be found on the National Grid website:

http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/current/H_11/

Impact on National Electricity Transmission System (NETS)

4.3 The proposed changes will not have a material impact on the NETS.

Impact on Grid Code Users

4.4 The proposed modification will ensure only those BM Units with an installed EDL connection can submit Bid-Offer data.

Impact on Greenhouse Gas emissions

4.5 The proposed modification will have a net zero impact on the level of Greenhouse.

Assessment against Grid Code Objectives

4.6 National Grid considers that Modification H/11 would better facilitate the Grid Code objective:

- (i) to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity;

This objective is better facilitated as the change would reference an updated Data Validation, Consistency and Defaulting Rules document which has been updated to promote more efficient despatch of units.

- (ii) 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);

The proposal has a neutral impact on this objective.

- (iii) 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; and

This objective is better facilitated as the change would reference an updated Data Validation, Consistency and Defaulting Rules document which will ensure that BM instructions will only be issued to those BM Units with an EDL connection. Issuing multiple instructions through manual means (i.e. telephone instruction) is, at times, impractical and potentially detrimental to system security.

- (iv) 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.

The proposal has a neutral impact on this objective.

Impact on core industry documents

4.7 The proposed modification does not impact on any core industry documents.

Impact on other industry documents

4.8 The proposed modification impacts the Grid Code Associated document: *Data Validation, Consistency and Defaulting Rules*.

5 Consultation Responses

- 5.1 National Grid has consulted Authorised Electricity Operators (AEOs) on this issue. The consultation period for both, the H/11 Industry Consultation and the informal *Data Validation, Consistency and Defaulting Rules* consultation opened on 28th November 2011 and closed on 28th December 2011. Two responses were received during the consultation period that related to both consultations.
- 5.2 The below table provides an overview of the two responses received. Copies of the responses are included in Annex 2.

Ref	Company	Supportive?	Views
H/11-CR-01	RWE Supply and Trading	Yes	This response focused on the informal consultation and made a number of suggestions.
H/11-CR-02	Elexon	Yes	This response focused on the informal consultation and expressed two views, the appropriateness of 59 as a value for N and possible unintended consequence of interaction between two different rules.

- 5.3 H/11–CR-01 - Most of the comments made by this respondent have been incorporated into the final Data Validation, Consistency and Defaulting Rules document.
- 5.4 H/11-CR-02 - National Grid believes 59, as a value for N, is appropriate because of the length of gate closure and has contacted the respondent to provide more detail on our views. The possible unintended consequences between two of the rules has resulted in an additional rule, D_BOD_2, in the final Data Validation, Consistency and Defaulting Rules document.
- 5.5 National Grid's response to the points raised can be found in Annex 2. The H/11 Annexes are contained in a separate document and can be found on the National Grid website:

http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/current/H_11/

Changes made in response to the informal consultation

- 5.6 The wording, of the additional validation rule and new additional section, specified in paragraph 2.1 has been amended slightly.
- 5.7 A second new validation rule has been inserted into the document (Section 5.8, D_BOD_2).
- 5.8 The document has had outdated pages removed, general formatting changes, and text deletions / additions (to add additional clarity).
- 5.9 A change marked (note formatting changes are not shown) Data Validation, Consistency and Defaulting Rules document is attached (as Annex 3 in the separate document issued with this report), with Section 3, below, detailing the substantive changes that have been made.