

## Grid Code Data Exchange Working Group

### Overview of Possible Solutions

#### **Introduction**

This paper outlines possible Grid Code solutions which would address the interaction between the STC and Grid Code on an enduring basis and highlights associated issues which may inform the debate by Working Group members.

The document is a discussion aid only and does not preclude the Working Group identifying other possible solutions.

#### **Background**

Schedule 3 (Information and Data Exchange Specification) of the STC specifies the User data that is permitted to be exchanged from National Grid (as GB System Operator) to Scottish Power Transmission (SPT) and Scottish Hydro Electric Transmission (SHETL) as the Transmission Owners (TOs). Limitations within Schedule 3 were put in place to prevent the potential for Users' data being passed by the TOs to affiliated parties in the same group company. The restrictions were in addition to the existing provisions within the TOs' licence conditions which prohibit the exchange of relevant data to other group interests.

At the time of BETTA Go-Live a specific reference to this version of the STC (and associated Schedule 3 provisions) was placed in the Grid Code<sup>1</sup>. As such any amendments proposed to Schedule 3 of the STC, with respect to the exchange of User data, would require a consequential amendment to the Grid Code.

#### **Potential Solutions**

##### **Option 1 – STC Arrangements Backed Off in Grid Code**

- Any changes to data exchange provisions in the STC will require consequential changes to the relevant Grid Code clauses.
- Users able to actively participate in the proposed changes via the appropriate forum.
- Limited input into the actual data provision changes (via STC governance arrangements).
- Administrative burden in maintaining cross code provisions.
  - STC new code, processes 'bedding in', provisions may require amendment to reflect business activities/requirements.

##### **Option 2 – Data Provisions and Process Mechanism Governed by STC**

- Alleviate any possible inconsistencies between STC and Grid Code provisions.
- STC is not a User facing document.
  - STC Committee is obligated to consider matters arising from consultation process but have final decision regarding proposal submitted to Authority.
- Cross governance issues not applicable.
  - Efficient utilisation of governance arrangements.
- Users will have limited input into what data is exchanged between National Grid and TOs (via STC governance arrangements).
- TOs are bounded to their Licence obligations regarding the transfer of data to other parties.

##### **Option 3a – Schedule 3 provisions transferred from the STC into the Grid Code**

- Users able to actively participate in proposed changes via the appropriate forum i.e. GCRP.
- Grid Code would have to be amended such that TOs are party to the relevant provisions.
- Progression (timeline) of proposed changes – impact on operational activities.
- Appropriateness of forum to discuss such issues.
  - Investment planning issue.

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<sup>1</sup> Information Exchange under the STC – Ofgem conclusions (March 2005) – Paragraph 3.33

- Significant changes may be required to STC and grid Code (including governance arrangements)

**Option 3b – Schedule 3 provisions replicated into the Grid Code**

- Cross governance arrangements.
  - Are the existing coordination provisions applicable/appropriate?
- Proposals evaluated against differing objectives/criteria.
- May result in inconsistencies, complexity regarding the governance arrangements and code provisions.
- Administrative burden in maintaining cross code provisions.
  - STC new code, process 'bedding in', provisions may require amendment to reflect business activities/requirements.
- Ineffectual usage of governance framework.
  - Code governance arrangements have previously been established such that they are interdependent of each other.
  - Complexities in aligning STC and Grid Code governance process and associated timelines.

**Option 4 – New Obligations for Permitting the Transfer of User Data**

- New 'high level' obligations inserted into the Grid Code which National Grid would be required to fulfil regarding the transfer of User data.
  - e.g. National Grid will only transfer data to the Relevant Transmission Licencees which is required solely for the purposes of transmission activities.
- Cross governance issues not applicable.
  - Efficient utilisation of governance arrangements.
- Users will have limited input into what data is exchanged between National Grid and TOs (via STC governance arrangements).
- TOs are bounded to their Licence obligations regarding the transfer of data to other parties.