

VERZONDEN 13 JUNI 2016



Postbus 718, 6800 AS Arnhem, Nederland
Autoriteit Consument en Markt
T.a.v. de heer dr. F.J.H. Don
Postbus 16326
2500 BH DEN HAAG

DATUM 13 juni 2016
UW REFERENTIE
ONZE REFERENTIE REC-N 16-022
BEHANDELD DOOR Johan Janssen
TELEFOON DIRECT
E-MAIL

BETREFT Methodologieën op basis van de artikelen 16 en 17 van de Verordening (EU) 2015/1222 (CACM)

Geachte heer Don,

Hierbij ontvangt u een tweetal voorstellen voor methodologieën die door de gezamenlijke Europese TSO's in ENTSO-E verband zijn opgesteld op basis van de Verordening (EU) 2015/1222 van 24 juli 2015 tot vaststelling van richtsnoeren betreffende capaciteitstoewijzing en congestiebeheer (afgekort: CACM).

Het betreft:

1. "All TSOs' proposal for a generation and load data provision methodology in accordance with Article 16 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management" (afgekort: GLDPM) d.d. 13 mei 2016.
2. "All TSOs' proposal for a common grid model methodology in accordance with Article 17 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management" (afgekort: CGMM) d.d. 27 mei 2016.

U wordt verzocht beide voorstellen vast te stellen krachtens artikel 9, vijfde lid, van de CACM.

Beide voorstellen bevatten geen vertrouwelijke gegevens en kunnen integraal door u gepubliceerd worden.

Daarnaast ontvangt u de reactie van de gezamenlijke Europese TSO's in ENTSO-E verband die is opgesteld naar aanleiding van de publieke consultatie die door ENTSO-E voor beide voorstellen is uitgevoerd krachtens artikel 12, derde lid, van de CACM.

Hoogachtend,
TenneT TSO B.V.

i.o.

Jan-Paul Dijkmans
Senior Manager Regulation NL

All TSOs' proposal for a generation and load data provision methodology in accordance with Article 16 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

13 May 2016

All TSOs, taking into account the following:

Whereas

- (1) This document is a common proposal developed by all Transmission System Operators (hereafter referred to as "TSOs") regarding the development of a proposal for a generation and load data provision methodology (hereafter referred to as "GLDPM").
- (2) This proposal (hereafter referred to as the "GLDPM Proposal") takes into account the general principles and goals set in Commission Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management (hereafter referred to as "Regulation 2015/1222") as well as Regulation (EC) No 714/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the network for cross-border exchanges in electricity (hereafter referred to as "Regulation (EC) No 714/2009"). The goal of Regulation 2015/1222 is the coordination and harmonisation of capacity calculation and allocation in the day-ahead and intraday cross-border markets. To facilitate these aims, it is necessary for all TSOs to use a common grid model. A common grid model can only be created if all TSOs have access to the generation and load data that this requires. "Generation" encompasses all injections into the transmission network and "Load" encompasses all withdrawals from the transmission network.
- (3) While the GLDPM described in the present GLDPM Proposal sets out requirements with respect to the delivery of the generation and load data required to establish the common grid model, the rules on how to establish the common grid model itself are addressed in the common grid model methodology pursuant to Article 17 of Regulation 2015/1222.
- (4) Article 16 of Regulation 2015/1222 constitutes the legal basis for this proposal and defines several specific requirements that the GLDPM Proposal should take into account:
 - "1. By 10 months after the entry into force of this Regulation all TSOs shall jointly develop a proposal for a single methodology for the delivery of the generation and load data required to establish the common grid model, which shall be subject to consultation in accordance with Article 12. The proposal shall include a justification based on the objectives of this Regulation for requiring the information.*
 - 2. The proposal for the generation and load data provision methodology shall specify which generation units and loads are required to provide information to their respective TSOs for the purposes of capacity calculation.*
 - 3. The proposal for a generation and load data provision methodology shall specify the information to be provided by generation units and loads to TSOs. The information shall at least include the following: (a) information related to their technical characteristics; (b) information related to the availability of generation units and loads; (c) information related to the schedules of generation units; (d) relevant available information relating to how generation units will be dispatched.*
 - 4. The methodology shall specify the deadlines applicable to generation units and loads for providing the information referred to in paragraph 3.*
 - 5. Each TSO shall use and share with other TSOs the information referred to in paragraph 3. The information referred to in paragraph 3(d) shall be used for capacity calculation purposes only.*

6. No later than two months after the approval of the generation and load data provision methodology by all regulatory authorities, ENTSO for Electricity shall publish: (a) a list of the entities required to provide information to the TSOs; (b) a list of the information referred to in paragraph 3 to be provided; (c) deadlines for providing information."
- (5) Article 2(2) of Regulation 2015/1222 defines the common grid model as
"a Union-wide data set agreed between various TSOs describing the main characteristic (sic) of the power system (generation, loads and grid topology) and rules for changing these characteristics during the capacity calculation process"
- (6) Article 2(1) of Regulation 2015/1222 defines an individual grid model as
"a data set describing power system characteristics (generation, load and grid topology) and related rules to change these characteristics during capacity calculation, prepared by the responsible TSOs, to be merged with other individual grid model components in order to create the common grid model"
- (7) Article 19 of Regulation 2015/1222 also includes relevant provisions:
"2. Each individual grid model shall represent the best possible forecast of transmission system conditions for each scenario specified by the TSO(s) at the time when the individual grid model is created.
3. Individual grid models shall cover all network elements of the transmission system that are used in regional operational security analysis for the concerned time-frame."
5. Each TSO shall provide all necessary data in the individual grid model to allow active and reactive power flow and voltage analyses in steady state."
- (8) The first paragraph of Article 9(9) of Regulation 2015/1222 sets out two further obligations:
"The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation."
- (9) Article 28(1) and (2) of Regulation 2015/1222 formulates additional obligations relevant for the GLDPM Proposal addressed to the generation units and loads as data providers:
"1. For each capacity calculation time-frame referred to in Article 14(1), each generator or load unit subject to Article 16 shall provide the data specified in the generation and load data provision methodology to the TSO responsible for the respective control area within the specified deadlines.
2. Each generator or load unit providing information pursuant to Article 16(3) shall deliver the most reliable set of estimations practicable."
- (10) Article 24 of Regulation 2015/1222 refers to one way of making use of the data obtained on the basis of the generation and load data provision methodology that is separate from the use of the data in each TSO's individual grid model:
"1. The proposal for a common capacity calculation methodology shall include a proposal for a methodology to determine a common generation shift key for each bidding zone and scenario developed in accordance with Article 18.
2. The generation shift keys shall represent the best forecast of the relation of a change in the net position of a bidding zone to a specific change of generation or load in the common grid

model. That forecast shall notably take into account the information from the generation and load data provision methodology."

- (11) Article 9(9) of Regulation 2015/1222 requires that the expected impact of the GLDPM Proposal on the objectives of Regulation 2015/1222 is described. The impact is presented below (points (12) to (21) of this Whereas Section). The description of the impact of the GLDPM Proposal on the objectives of Regulation 2015/1222 should be read in conjunction with the related articles of the Common Grid Model Methodology required pursuant to Article 17 of Regulation 2015/1222 being a companion methodology to the GLDPM Methodology.
- (12) The GLDPM Proposal contributes to and does not in any way hamper the achievement of the objectives of Article 3 of Regulation 2015/1222. In particular, the GLDPM Proposal serves the objective of promoting effective competition in the generation, trading and supply of electricity (Article 3(a) of Regulation 2015/1222) in contributing to coordinated capacity calculation by prescribing the inputs required from the addressees of the proposal to facilitate the preparation of individual grid models to be merged into the common pan-European grid model.
- (13) In respect of ensuring the optimal use of transmission infrastructure further to Article 3(b) of Regulation 2015/1222, the GLDPM Proposal contributes to coordinated capacity calculation by prescribing the inputs required from the addressees of the proposal to facilitate the preparation of individual grid models to be merged into the common pan-European grid model, which will allow determinations to be made regarding the optimum availability of the transmission grid and thus, the optimal use of the transmission infrastructure.
- (14) The GLDPM Proposal takes into account operational security in accordance with Article 3(c) of Regulation 2015/1222 by requiring the provision of information from the addressees of the proposal to allow specific modelling of all grid elements, generation and load at 220 kV or above or of less than 220 kV where they are used in regional operational security analysis.
- (15) In accordance with Article 3(d) of Regulation 2015/1222, and taking into account the capacity calculation methodologies to be developed under Regulation 2015/1222, the creation of the common grid model and use thereof in the capacity calculation process will optimise the calculation and allocation of cross-zonal capacity by ensuring a common methodology and inputs for the preparation of individual grid models to be merged into the common pan-European grid model. The GLDPM Proposal contributes to meeting this objective of Regulation 2015/1222 by prescribing the inputs required from the addressees of the proposal to facilitate the preparation of individual grid models to be merged into the common pan-European grid model.
- (16) The GLDPM Proposal ensures that the objective of fair and non-discriminatory treatment of TSOs, NEMOS, the Agency, regulatory authorities and market participants is met insofar as the requirements in respect of data provision by the addressees of the GLDPM Proposal are common and binding throughout the Union. The GLDPM Proposal, in setting out requirements for data provision to facilitate the operation of the Common Grid Model Methodology required pursuant to Article 17 of Regulation 2015/1222, contributes to the general aim of equal access to cross-zonal capacity further to Article 3(e) of the Regulation 2015/1222.
- (17) The CGMM Methodology ensures and enhances the transparency and reliability of information further to Article 3(f) of Regulation 2015/1222 by providing for monitoring of the quality and timely delivery of data to TSOs. The detailed requirements in relation to data provision in the

- GLDPM Proposal enhance the reliability of the data that will be available to TSOs for the purposes of creating individual grid models and the creation of the common grid model.
- (18) The GLDPM Proposal also contributes to the objective of respecting the need for a fair and orderly market and price formation (Article 3(h) of the Regulation 2015/1222) by contributing to the provision of a common grid model to be used in the capacity calculation process on the basis of the common grid model.
 - (19) The GLDPM Proposal will contribute to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union by virtue of outlining the common requirements in terms of data provision to be used as inputs for creating the common grid model that will be used in a coordinated manner throughout the Union.
 - (20) The GLDPM Proposal contributes to the objective of providing non-discriminatory access to cross-zonal capacity (Article 3(j) of the Regulation 2015/1222) again by specifying the common data provision requirements that form the basis for provision of the common grid model.
 - (21) Article 16(1) of Regulation 2015/1222 requires that a justification based on the objectives of the regulation for requiring the information sought is included in this proposal. It has been outlined that the GLDPM Proposal complies generally with the objectives of Regulation 2015/1222 in that the information being sought contributes to the formation of the common grid model, further to the requirements outlined in the Common Grid Model Methodology as required under Article 17 of the regulation. The information required to be provided by the addressees of the GLDPM Proposal constitute the inputs required by TSOs to prepare their individual grid models further to the Common Grid Model Methodology referenced above. As the GLDPM Proposal prevents double-reporting of information by the addressees of the proposal, the requirements for information provision are balanced and proportionate. The proposal further allows for the continuation of data provision under existing mechanisms in individual jurisdictions throughout the Union, thus ensuring as minimal an impact as possible on the addressees of the proposal.

SUBMIT THE FOLLOWING GLDPM PROPOSAL TO ALL REGULATORY AUTHORITIES:

Article 1

Subject matter and scope

1. The generation and load data provision methodology described in this proposal is the common proposal of all TSOs in accordance with Article 16 of Regulation 2015/1222.
2. This methodology shall apply in the area referred to in Article 1 (2) of Regulation 2015/1222.
3. This methodology shall also apply to those jurisdictions outside the area referred to in Article 1 (2) of Regulation 2015/1222 whose TSOs have joined the CGM process on a voluntary basis in accordance with the provisions in Article 1 of the common grid model methodology.
4. The TSOs referred to in paragraph 1 shall monitor that in those jurisdictions participating in the CGM process on a voluntary basis pursuant to paragraph 3 all relevant parties respect their obligations. If the relevant parties do not respect their essential obligations in a way that significantly endangers the implementation and operation of Regulation 2015/1222, the TSOs in the area referred to in paragraph 1 shall terminate the voluntary participation in the CGM process of the

TSO(s) in the corresponding jurisdictions in accordance with the procedure set out in Article 9(2) of Regulation 2015/1222.

5. This methodology does not apply to HVDC connections that are operated by one TSO if the corresponding Member State has assigned the responsibility for complying with the obligations set out in Article 16 of Regulation 2015/1222 to a different TSO.

Article 2

Definitions and interpretation

For the purposes of this proposal, the terms used shall have the meaning of the definitions included in Article 2 of Regulation 2015/1222 and the other items of legislation referenced therein. In addition, the following definitions shall apply:

1. 'CGM area' means the area covered by the common grid model; this is the set of (i) bidding zones whose TSOs contribute their IGM to the CGM plus (ii) the interconnections linking these bidding zones with bidding zones that do not contribute an individual grid model to the CGM (i.e., are not part of the CGM area);
2. 'CGM process' means all stages and all aspects of the process by which TSOs build and share individual grid models and merge these into common grid models;
3. 'conforming load' means a load whose active and reactive power consumption shall be scaled when scaling the overall load;
4. 'equivalent model' means a set of modelled grid elements which together have the same electrical behavior as a part of the network. Equivalent models are obtained through a process known as model reduction;
5. 'implementation rules' means the set of rules describing the methods and data formats to be used by the parties providing data to TSOs under the generation and load data provision methodology as well as any additional instructions from TSOs that are relevant in this respect; to be prepared by TSOs under the applicable national legislation or regulations;
6. 'maximum permissible TATL duration' means the maximum period of time that a loading in excess of the PATL and less than or equal to the TATL can be sustained without risk to the equipment;
7. 'non-conforming load' means a load whose active and reactive power consumption shall not be scaled when scaling the overall load;
8. 'PATL (permanent admissible transmission loading)' means the maximum loading in amperes, MW or MVA that can be sustained on a transmission line, cable or transformer for an unlimited duration without risk to the equipment;
9. 'substation voltage limits' means the maximum and minimum acceptable voltages for modelled substations at each nominal voltage level as per the locally applicable power quality and system security standards;
10. 'TATL (temporary admissible transmission loading)' means the maximum loading in amperes, MW or MVA that can be sustained for a limited duration without risk to the equipment;
11. 'tripping current' means the maximum current threshold above which a transmission line, cable or transformer will trip without delay.

Article 3

General principles

1. This methodology sets out the generation and load data which may be required by TSOs in order to establish the common grid model. Each TSO shall have the right but not the obligation to obtain these data from the owner of the corresponding network element or the party responsible for providing the information, as the case may be, provided that all of the following conditions are met:
 - a. the TSO requires the data in order to build its individual grid model or to meet other obligations that are essential to establishing the common grid model; the set of required data shall be the minimum set that enables the TSO to do so;
 - b. the data are not already available to the TSO
 - i. either pursuant to national legislation or regulation, on a contractual basis or based upon some other kind of legally binding mechanism;
 - ii. or as data publicly available via the central information transparency platform pursuant to Regulation 543/2013 or pursuant to Regulation 1227/2011 (REMIT).
2. This methodology does not confer upon TSOs the right to request data not explicitly described in this methodology. For avoidance of doubt, real-time data are out of scope of the present methodology.
3. The harmonisation requirement set out in Article 19(4) of Regulation 2015/1222 shall be understood to refer to the harmonisation of modelling principles. TSOs shall not invoke the harmonisation requirement in order to obtain data which they do not require in order to build their individual grid model or in order to meet other obligations that are essential to establishing the common grid model.
4. Except where explicitly stated otherwise, the owner of the corresponding network element shall be the party required to provide the data to the TSO.
5. Data to be provided to the TSO under this methodology shall, in principle, be provided directly to the TSO. Subject to the agreement of the TSO, parties required to provide data under the generation and load data provision methodology shall be allowed to delegate tasks in accordance with the principles set out in Article 81 of Regulation 2015/1222. The TSO shall not unreasonably withhold its agreement.
6. Subject to the confidentiality obligations set out in Article 13 of Regulation 2015/1222, TSOs may share the data obtained with other TSOs that participate in the CGM process pursuant to Article 16(3) of Regulation 2015/1222 as well as the alignment agents referred to in Article 19(7) of the common grid model methodology, the merging agents referred to in Article 20(1) of the common grid model methodology, and the ENTSO for Electricity in its role as owner of the information platform referred to in Article 21 of the common grid model methodology.
7. Regarding the enforceability of the present methodology and the dispute resolution related to its provisions including the implementation and interpretation of this methodology and the proper functioning of the data provision process the relevant Union and national law applies.
8. All times stated in this GLDPM Proposal refer to market time as defined in Article 2(15) of Regulation 2015/1222.

9. This methodology solely relates to the provision of data and deadlines associated with the CGM process and does not affect existing or future obligations to provide data or deadlines related to any other system operation process if those obligations to provide data or those deadlines are based on national legislation or regulation, contractual arrangements, or some other kind of legally binding mechanism.

Article 4

Data provision

1. Each party obliged to provide data under this methodology shall respect the implementation rules set by the responsible TSO.
2. This methodology in conjunction with the provisions of the common grid model methodology as required under Article 17 of Regulation 2015/1222 shall make it possible to create the common grid model pursuant to Article 28 of Regulation 2015/1222. In particular, this means that this methodology relates to the elements of the high-voltage and extra high-voltage network, insofar as these are used in regional operational security analysis for the concerned time-frame.
3. Where this methodology refers to a breakdown by primary energy sources, a breakdown into primary energy sources consistent with those used by the central information transparency platform referred to in Article 3 of Regulation 543/2013 is required.

Article 5

Distribution and closed distribution system operators – structural data

1. Distribution and closed distribution system operators shall provide the structural data described in paragraph 2 of this Article if these grid elements pertain to a voltage level
 - a. of 220 kV or above;
 - b. of less than 220 kV and they are used in regional operational security analysis.
2. The relevant grid elements and the data to be provided for these are
 - a. sub-stations: voltage levels, busbar sections and if applicable to the modelling approach used by the TSO switching devices to include switching device identifier and switching device type, comprising either breaker or isolator or load break switch;
 - b. lines or cables: electrical characteristics, the sub-stations to which these are connected;
 - c. power transformers incl. phase-shifting power transformers: electrical characteristics, the sub-stations to which these are connected, the type of tap changer, and type of regulation, where applicable;
 - d. power compensation devices and flexible AC transmission systems (FACTS): type, electrical characteristics, and type of regulation where applicable.
3. Distribution and closed distribution system operators shall provide a model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV if
 - a. these parts of the grid are used in regional operational security analysis, or
 - b. the relevant grid elements in those parts of the grid are connecting

- i. a generation unit or load modelled in detail in accordance with Article 8 or 11 to the 220 kV or higher voltage level; or
 - ii. two nodes at the 220 kV or higher voltage level.
4. Models and equivalent models pursuant to paragraph 3 shall contain aggregates of load separated from generation and generation capacity separated by primary energy sources and separated from load in the corresponding parts of the grid broken down by sub-stations of the equivalent model or the sub-stations to which the corresponding parts of the grid are connected.
5. Distribution and closed distribution system operators shall provide the following information on operational monitoring limits for the relevant grid elements described in this Article:
 - a. a PATL reflecting the nominal rating for each season if the rating does not depend upon meteorological conditions or the pre-fault loading;
 - b. one or more TATLs, reflective of the corresponding season and based on the applicable PATL, for each explicitly modelled transmission line, cable, transformer and relevant item of DC equipment;
 - c. for each TATL specified pursuant to point (b) a TATL duration;
 - d. tripping current for each relevant item of explicitly modelled transmission equipment, if applicable;
 - e. maximum and minimum acceptable voltages at each nominal voltage level, as per relevant locally applicable codes, standards, licences, policies and agreements.

Article 6

Distribution and closed distribution system operators – infrequently changing variable data

1. Distribution and closed distribution system operators shall provide the following infrequently changing variable data for the relevant network elements:
 - a. the tap position of all modelled power transformers including phase-shifting transformers without regulation;
 - b. the best forecast operational topological situation defined as the expected configuration of the corresponding parts of the grid;
 - c. control settings for the following items of regulating equipment referred to in Articles 5 and 8, respectively, where modelled and relevant:
 - i. power transformers and associated tap changers;
 - ii. phase-shifting transformers and associated tap changers;
 - iii. reactive compensation devices:
 1. shunt compensators - shunt capacitors or reactors or discretely switchable banks of shunt capacitors or reactors;
 2. static VAR compensators;
 3. synchronous condensers;
 4. static synchronous compensators (STATCOMs) and other flexible AC transmission system (FACTS) devices;
 - iv. generators - with respect to voltage regulation;
 - d. the control settings pursuant to point (c) shall include the following data where applicable:

- i. regulation status - enabled or disabled;
- ii. regulation mode - voltage, active power, reactive power, power factor, current or another mode as appropriate;
- iii. regulation target or target range - in kV, MW, Mvar, p.u. or another unit as appropriate;
- iv. regulation target deadband;
- v. regulation participation factor;
- vi. regulated node.

Article 7

Distribution and closed distribution system operators – variable data

1. Distribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5:
 - a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable;
 - b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 as well as topological agreed measures pursuant to Article 22 of the common grid model methodology;
 - c. forced unavailability of modelled equipment if applicable for the concerned time-frame.

Article 8

Generation – structural data

1. Owners of generation units including synchronous condensers and pumps shall provide the relevant information described in this Article if these are modelled in detail, whether on an individual or composite basis. Generation units shall be modelled in detail if they are connected at a voltage level
 - a. of 220 kV or above;
 - b. of less than 220 kV and they are used in regional operational security analysis.
2. Several identical or similar generation units may be modelled in detail on a composite basis if this modelling approach is sufficient with respect to regional operational security analysis. For generation units modelled in detail on a composite basis an equivalent model shall be included in the individual grid model. The owners of the individual generation units shall provide the detailed information on the generation units and the relevant DSO shall provide detailed information on the grid connections such that the TSO can compute the equivalent model. Alternatively the complete equivalent model shall be provided to the TSO.
3. Distribution including closed distribution system operators shall provide the relevant information described in this Article for generation capacity not modelled in detail. This generation capacity shall be modelled as aggregates separated by primary energy sources and separated from load.
4. For both generation units modelled in detail and for aggregates of generation capacity separated by primary energy sources and separated from load the following data shall be provided:

- a. connection point;
 - b. primary energy source.
5. For generation units modelled in detail, the following data shall be provided:
- a. maximum active power and minimum active power; defined as those values which the generation unit can regulate to. In the case of hydroelectric pumped storage generation units, two cycles shall be modelled and two records have to be provided, being one for the generating mode and one for the pumping mode;
 - b. the type of control mode, being one of the following: disabled, voltage control, power factor control, reactive power control and, for voltage-controlled generation units, the regulated buses, where the scheduled voltage is set up;
 - c. maximum and minimum values of reactive power when the minimum and maximum active power is delivered as well as the associated capability curve;
 - d. the auxiliary load of the generation unit representing the internal demand of the generation unit shall be modelled as a non-conforming load at the connection point of the generation unit.
6. For generation units modelled as aggregates the following data shall be provided:
- a. aggregates of generation capacity separated by primary energy sources and separated from load in the corresponding parts of the grid referred to in Article 5 broken down by sub-stations of the equivalent model or the sub-stations to which the corresponding parts of the grid are connected.
7. For generation units modelled as aggregates and managed by an aggregator whose data are used in regional operational security analysis, the aggregator shall provide the following data:
- a. aggregates of generation capacity separated by primary energy sources and separated from load managed by the aggregator in the corresponding parts of the grid broken down by sub-stations of the equivalent model or the sub-stations to which the corresponding parts of the grid are connected.

Article 9

Generation – infrequently changing variable data

1. Owners of generation units modelled in detail or, in the case of generation units modelled in detail on a composite basis, the owners of the individual generation units shall provide the following infrequently changing variable data for the generation units referred to in Article 8:
 - a. applicable priority dispatch requirements.
2. The information referred to in paragraph (1)(a) constitutes relevant available information relating to how generation units will be dispatched pursuant to Article 16(3)(d) of Regulation 2015/1222 and shall be used for capacity calculation purposes only.

Article 10

Generation – variable data

1. Owners of generation units modelled in detail or, in the case of generation units modelled in detail on a composite basis, the owners of the individual generation units shall provide the following variable data for the generation units referred to in Article 8:
 - a. information about upward and downward active power reserves and other types of ancillary services;
 - b. outage plans;
 - c. testing profiles;
 - d. scheduled unavailability;
 - e. any active power capacity restrictions;
 - f. latest available market schedules;
 - g. forecast active power output.
2. The information referred to in paragraph (1)(a) and (1)(g) constitutes relevant available information relating to how generation units will be dispatched pursuant to Article 16(3)(d) of Regulation 2015/1222 and shall be used for capacity calculation purposes only.
3. Aggregators of generation units whose data are used in regional operational security analysis shall provide the following variable data:
 - a. latest available market schedules.

Article 11

Load – structural data

1. Loads shall provide the relevant information described in this Article if they are modelled in detail whether on an individual or composite basis. Loads shall be modelled in detail if they are connected at a voltage level
 - a. of 220 kV or above;
 - b. of less than 220 kV and they are used in regional operational security analysis.
2. Several identical or similar loads may be modelled in detail on a composite basis if this modelling approach is sufficient with respect to regional operational security analysis. For loads modelled in detail on a composite basis an equivalent model shall be included in the individual grid model. The owners of the loads shall provide the detailed information on the loads and the relevant DSO shall provide detailed information on the grid connections such that the TSO can compute the equivalent model. Alternatively the complete equivalent model shall be provided to the TSO.
3. Distribution including closed distribution system operators shall provide the relevant information described in this Article for loads not modelled in detail which shall be modelled as aggregates.
4. For both loads modelled in detail and for aggregates of loads separated from generation the following data shall be provided:
 - a. connection point;
 - b. maximum active power consumption;
 - c. power factor or reactive power;

- d. conforming flag where the value "true" means that the active and reactive power consumption of the load shall be scaled when scaling the overall load.
5. For loads modelled in detail the following data shall be provided:
 - a. characteristics of reactive power control if installed;
 - b. maximum and minimum active power available for demand response and the maximum and minimum duration of any potential usage of this power for demand response.
6. For loads modelled as aggregates the following data shall be provided:
 - a. aggregates of loads separated from generation in the corresponding parts of the grid referred to in Article 5 broken down by sub-stations of the equivalent model or the sub-stations to which the corresponding parts of the grid are connected.
7. For loads modelled as aggregates and managed by an aggregator whose data are used in regional operational security analysis, the aggregator shall provide the following data:
 - a. aggregates of maximum and minimum active power available for demand response separated from generation and the maximum and minimum duration of any potential usage of this power for demand response managed by the aggregator in the corresponding parts of the grid broken down by sub-stations of the equivalent model or the sub-stations to which the corresponding parts of the grid are connected.

Article 12

Load – variable data

1. Owners of loads modelled in detail or, in the case of loads modelled in detail on a composite basis, the owners of the individual loads, shall provide the following variable data for the loads referred to in Article 11:
 - a. planned outages;
 - b. forecast of unrestricted active power available for demand response and any planned demand response;
 - c. scheduled active and forecast reactive consumption.
2. Aggregators of loads whose data are used in regional operational security analysis shall provide the following variable data:
 - a. forecast of unrestricted active power available for demand response and any planned demand response.

Article 13

HVDC links – structural data

1. HVDC links shall be modelled regardless of whether these are located entirely within a single bidding zone or they connect two bidding zones. The TSO or TSOs concerned shall decide on the degree of detail with which the HVDC link is to be modelled. They shall base their decision on the functions for which the HVDC link is to be used. By default an HVDC link shall be modelled in

detail and the AC/DC part of the HVDC link shall be exchanged unless the functions that it is used for do not require this.

2. For both HVDC links modelled in detail and for those modelled in a simplified manner, the owner shall provide the following data:
 - a. connection points.
3. For HVDC links to be modelled in detail the owner shall provide a detailed model which shall include
 - a. electrical characteristics;
 - b. type and characteristics of supported control modes.
4. HVDC links modelled in a simplified manner shall be represented by equivalent injections at the connection points and the owner shall not have to provide additional structural data.

Article 14

HVDC links – infrequently changing variable data

1. Owners of HVDC links modelled in detail shall provide the following infrequently changing variable data for the HVDC links referred to in Article 13:
 - a. control settings including
 - i. operating mode - inverter/rectifier;
 - ii. control mode - voltage, active power, reactive power, power factor, current, or similar mode;
 - iii. voltage targets;
 - iv. regulated nodes.

Article 15

HVDC links – variable data

1. Owners of HVDC links modelled in detail shall provide the following variable data for the HVDC links referred to in Article 13:
 - a. active power targets.

Article 16

Deadlines for providing the information

1. The default deadlines for providing the information by type of data item are as follows:
 - a. structural data: six months before the entry into operation or the implementation of a change in the relevant characteristics of the corresponding network element; the continued validity of the data provided needs to be confirmed every year by 01 April;
 - b. infrequently changing variable data:

- i. changes expected during the following year need to be signalled to the TSO by 01 April of each year;
 - ii. changes expected during the following month need to be signalled to the TSO by the 5th day of each month;
 - iii. for changes expected at shorter time horizons the deadlines for variable data apply;
 - c. variable data:
 - i. for the day-ahead capacity calculation time-frame: 15:15h two days before the day of delivery;
 - ii. for the intraday capacity calculation time-frame: 16:30h on the day before the day of delivery.
2. When setting deadlines for the provision of the data, each TSO may set a deadline that is less constraining for data providers than the default deadline specified in paragraph 1. Where a TSO has set a deadline that is less constraining than the default deadline and later wishes to modify that deadline in a way that is more constraining, it shall ensure that the principles outlined in Regulation 2015/1222 in terms of stakeholder consultation are adhered to or in the alternative, ensure that sufficient consultation and approval processes take place to satisfy the requirements at a national level, provided that such alternative approach remains in compliance with the general principles of stakeholder consultation outlined in Regulation 2015/1222. Under no circumstances shall TSOs set deadlines that are more constraining for data providers than the default deadlines in order to obtain data under this methodology.

Article 17

Quality monitoring

1. Each TSO shall monitor the quality of the data provided to it as well as the timeliness of data delivery and overall compliance with the implementation rules.
2. If a TSO identifies problems with respect to the quality of the data provided to it or the timeliness of data delivery or overall compliance with the implementation rules it shall in the first instance attempt to resolve these problems directly with the entity concerned.

Article 18

Timescale for implementation

1. Upon approval of the present methodology each TSO shall publish it on the internet in accordance with Article 9(14) of Regulation 2015/1222.
2. By one month after the approval of the present methodology, each TSO shall
 - a. inform the entities required to provide data about the information they are required to provide as well as the deadlines for providing the information;
 - b. forward the information set out in (a) to ENTSO-E;
 - c. prepare draft implementation rules on the practicalities of data provision specifying, for example, data formats and technical requirements with respect to the IT implementation of

the data provision process in accordance with the procedures applicable under national law. Each TSO shall ensure that these implementation rules make use of existing infrastructure and data delivery processes to the extent possible and it shall allow sufficient time for implementation; where appropriate TSOs shall also provide clarification on definitions and other guidance as may be required.

3. By two months after the approval of the present methodology, ENTSO-E shall publish the information referred to in Article 16(6) of Regulation 2015/1222.
4. By twelve months after the approval of the present methodology or 14 December 2017, whichever is later, each TSO shall ensure that the data provision process required in order to implement the methodology is operational; this entails that all necessary steps required by national legislation or regulations such as stakeholder consultation or NRA approval shall have been completed. At a minimum, implementation rules need to have been finalised and the data provision process needs to have been tested.

Article 19

Language

The reference language for this proposal shall be English. For the avoidance of doubt, where TSOs need to translate this proposal into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 9(14) of Regulation 2015/1222 and any version in another language the relevant TSOs shall, in accordance with national legislation, provide the relevant national regulatory authorities with an updated translation of the proposal.

All TSOs' proposals for a generation and load data provision methodology in accordance with Article 16 and for a common grid model methodology in accordance with Article 17 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

TSOs' response to comments submitted during the public consultation
(04 February to 04 March 2016)

13 May 2016

During the public consultation on the Common Grid Model Methodology as well as the Generation and Load Data Provision Methodology from 04 February until 04 March 2016, TSOs received a number of comments on the documents. In accordance with Article 12 (3) of Regulation 2015/1222, TSOs duly considered the views of stakeholders and provide, in the present cover note as well as the detailed response in tabular format attached hereto, their justification for incorporating or not incorporating stakeholders' comments into the Methodologies.

First of all, TSOs are grateful to the stakeholders who took part in the two workshops that were held and, especially, to everyone who provided written comments. The Methodologies drafting team reviewed the comments and prepared answers which are attached to the present cover note in a table.

About one-third of the comments related to the Common Grid Model Methodology; about two-thirds to the Generation and Load Data Provision Methodology. Looking at the comments as a whole, the overall impression is that on many – probably most – points raised, TSOs actually found themselves in agreement with stakeholders.

One theme in particular is common to many comments – that TSOs should not have too much discretion in setting deadlines, in demanding data etc. Thanks to this feedback, the GLDPM has now been revised in a way that imposes much stricter constraints on TSOs. We are confident that stakeholders will agree that this addresses the concerns with respect to excessive discretion.

The principles now set out in the GLDPM also address the request that TSOs justify a demand for data with cost-benefit analyses. To ask for cost-benefit analyses is reasonable. However, as this is not part of the legal requirements with respect to the methodologies, we have no mandate to pursue it. The concern about unreasonable demands for data is thus addressed in a different way. Specifically, TSOs shall only ask for the minimum they need in order to meet their legal obligations and NRAs will, of course, have a referee role (which should provide additional protection). We trust that stakeholders will find that approach reassuring.

Both documents were generally written much more tightly and now resemble a piece of legislation more than a set of technical explanations, so that should increase the clarity of the requirements further. Please note that one consequence of this is that some material which we indicate in our draft reply we will modify has disappeared from the documents altogether as part of the revision. However, we do still plan to prepare an explanatory document, which will provide some explanations of the content of the legally binding, formal proposals for methodologies. We shall endeavour to incorporate all comments therein. The explanatory document will also be published online, and we anticipate it will be published by early July 2016.

There is one topic that featured prominently in the comments as well as in the questions raised at the stakeholder workshop that we must disappoint stakeholders on: the request for publication of the Common Grid Model or elements thereof etc. TSOs are not in principle opposed to making additional non-

confidential data available. However, any such additional data releases shall not be covered in the CGM and GLDP Methodologies. There are two fundamental reasons for this.

Firstly, the question of the transparency of the common grid model and network data is outside the scope of the CGM and GLDP Methodologies established pursuant to Regulation 2015/1222. The Methodologies cannot go beyond their scope as established pursuant to the Regulation.

Secondly, the topic of the transparency of fundamental market data has in the past always been addressed in the context of the Transparency Regulation [*COMMISSION REGULATION (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council.*] As the transparency of the common grid model and network data is an important policy question, this requires a more in-depth discussion among TSOs, regulators, the European Commission, stakeholders and Member States. For this reason the matter should be tackled as part of future revisions/updates of the Transparency Regulation.

Finally, for the sake of completeness we also wish to add that some of the data or models requested are simply not available; for example, there will be no pan-European Common Grid Model for the monthly and weekly timeframes. Other information requested will depend on the capacity calculation methodologies processes and timeline and we note in this context that the capacity calculation methodologies are subject to consultation and also have to be published pursuant to Regulation 2015/1222.

This latter point notwithstanding, we think that the public consultation was of great benefit for both sides. It certainly helped TSOs to better understand stakeholders' concerns which resulted in "better" and fairer documents, so we want to take this opportunity to, once again, thank all stakeholders who took part in the consultation.

Attachment

Stakeholders' consultation comments and TSOs' detailed replies

Line #	Reviewer (email)	Comment / Question from stakeholders	Response (email)	Changes to Methodologies and other to data
0372_A	EDF	Context comment relating to GLDPM, aligned to line 3818 (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulations as well as in their regional or national implementation.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0382_A	IFTEC	With respect to the approach of ENTSDS to pursue one single CACM and GLDPM instead of respectively three and two because of requirements in other Guidelines, IFTEC can only welcome such approach as it would not be relevant to have several limited approaches with existing data differences.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0384_A	EDF	Since the current version of the CACM and CACM revision, only the information purposes, the requirements of the PCA (Source (not entered into law) and of the grid SO Guidelines (not under discussion in CACM), the scope of data provision obligations deriving from CACM Regulations) requirements should be clearly brought out in the two documents. Therefore, the chapters and provisions of the methodology which are dealing at the stage in accordance with CACM Regulation should be more easily consolidated compared to the current draft (e.g. using the same paragraph). The evolution would also facilitate the review process of the methodologies, since GL, PCA and GL SO will be integrated and entered into force.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0386_D	EDF	(Technical comment relating to GLDPM aligned to line 3842) EDF fully agrees on the need to amend and re-submit to public consultation and REPA approval the two methodologies (GL, PCA and GL SO) under this topic.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0390_A	EUROELECTRIC, SERVICIOS ELÉCTRICOS, ENERXIA	A consultation of one month is too short a period for a complete consultation. Associations need to coordinate in Europe, regionally and nationally with their member companies. Meaningful feedback to a consultation requires time to prepare and coordinate positions.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0393_A	EUROELECTRIC	We expressed at first stage during the workshop that "the information of the CCM will be publicly disclosed to the market". We want to insist on the fact that the level of confidentiality should in a way be related to the time horizon for which the grid model is elaborated. For instance, information of the grid models (including grid data) before D-7 should not be considered as confidential as it represents the best possible projections from TSOs, which highly depend on TSOs assumptions. Discussing these forecasts on forward horizon would help market parties to schedule maintenance and plan investments. In addition, we would like to re-iterate that there are no confidential data in the TSO models. In addition, we would like to re-iterate that there are no confidential data in the TSO models. In addition, we would like to re-iterate that there are no confidential data in the TSO models.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0393_C	EUROELECTRIC	We would like to underline that "confidentiality" has to be balanced with the necessary transparency for SCRs, which economic decisions are influenced by the capacity made available on the market. For instance, information of the grid models (including grid data) before D-7 should not be considered as confidential as it represents the best possible projections from TSOs, which highly depend on TSOs assumptions. Discussing these forecasts on forward horizon would help market parties to schedule maintenance and plan investments. In addition, we would like to re-iterate that there are no confidential data in the TSO models. In addition, we would like to re-iterate that there are no confidential data in the TSO models. In addition, we would like to re-iterate that there are no confidential data in the TSO models.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0393_D	IFTEC	An important element for IFTEC, also highlighted by ENTSDS and questioned by the CACM Guidelines, is the confidentiality of data used by the CACM and GLDPM. IFTEC reserves only the data on network elements from the TSOs should also be kept confidential, as this data is needed by many parties to be able to model their own views on the European grid. IFTEC believes that much (if not all) of the data related to the TSO grids already needs to be published under transparency rules, and in any case does not reason why all this data should be kept confidential, as it does not involve actors subject to competition for which confidentiality is important from a competition perspective.		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0393_E	EDF	Transparency on the Common Grid Models. EDF believes that the publication of non-confidential sections of Common Grid Models should be guaranteed by TSOs. In particular, CCMs should be published in their full extent for all interested parties D-2, which they reflect the best forecast made by system operators without any commercially sensitive information. The availability of this data will contribute to improve the accuracy of the forecasts provided by Significant Grid Users (SGUs), who can better anticipate the level of market prices in each bidding zone. As regards Significant Users (SGUs), D-2 and D-1 publications could be limited to the best available forecast of cross-border capacity (i.e. Non-Biased Demand and NTS) in order to enable market parties to better anticipate short-term evolution of market prices without having to disclose any confidential or sensitive information. Thus, a good level of transparency on the CCMs can have positive effects on the accuracy of the grid models themselves and would be consistent with the obligations imposed on TSOs by the Third Energy Package to provide anomalies and information on the available transfer capacity of their networks and on the availability and use of generation and load assets (Article 15 of Regulation 714/2009/EC).		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.
0396_A	EUROELECTRIC	We share everything stated at the point regarding the confidentiality of the data involved on the process. However, confidentiality should not be an argument to avoid transparency, especially when decisions have economic impact on SCRs. We consider essential that the CCM were published by the BSC or TSO responsible for their technical validation through channels which give exclusive access to the SCRs. A good example of this practice is the procedure followed by the Spanish TSO (REE) which publishes daily on a private web the best cases (BSC) used on the day-ahead technical		TSO's REPA (TSC) and active stakeholders for including or not the items resulting from the (...) stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM regulation. The present consultation gives stakeholders an opportunity to play an active role in the drafting of the methodologies, so we do not need to modify the methodology in the light of the comment.

2018-05-09-1400h

0042_A	EDF	According to Section 5, Regional Security Contributions (RSCs) are responsible for merging the RSCs of all relevant TSOs ensuring that their net positions are consistent. EDF recommends to clarify in this section the following points: i) the possibility for several TSOs to handle the job of a TSO, ii) the coordination procedures among RSCs to make regional CCMs consistent.		On (1): All RSCs will be technically able (i.e., will be able in principle) to handle all tasks related to each RSC. On (2): the CCM is a pan-European model by definition. There is no such thing as a regional CCM. Regional sub-sets of the CCM are by definition consistent because they are part of a consistent CCM (assuming, of course, that the CCM process results in a consistent CCM).	The editor to ensure that the following points are clearly stated in Chapter 5 on merging: On (1): All RSCs will be technically able (i.e., will be able in principle) to handle all tasks related to each RSC. On (2): the CCM is a pan-European model by definition. There is no such thing as a regional CCM. Regional sub-sets of the CCM are by definition consistent because they are part of a consistent CCM (assuming, of course, that the CCM process results in a consistent CCM).
0040_A	ELBLECTRIC	Objective is to "ensure optimal use of the transmission infrastructure". In our view the optimum is an unconstrained European market. As the network doesn't always facilitate that the CCM should provide the optimum solution given these constraints from a European perspective (trading at grid elements, internal and cross border, the same). TSO propose the way they are going to monitor how far they are from the optimum and propose a methodology to improve. The process should be transparent.		Your comment seems to relate to the capacity calculation methodology rather than the CCM. Therefore we consider it out of scope of the CCM and will not incorporate it.	
0042_A	ELBLECTRIC	As formulated in EL CACH Article 3, another objective of the CCM should be "to ensure and enhancing the transparency and reliability of information". We believe this objective is very important and should explicitly be added after line 42.		Thank you for this suggestion. We shall refer to all of the objectives listed in Article 3 of Regulation 2013/1222 as they would improve the quality of the documents. As for your request for the publication of additional data, please refer to the right to comment 0061 A.	
0041_A	ELBLECTRIC	However, in their Position Paper of CME MWs on Flow-Based Market Coupling, MWAs of the CME region added, as a first step towards the CCM, "the publication of grid elements characteristics (length, resistance, reactance, internal capacity). For the CME region with a topology level at least equivalent to the level given on the ENTSO-E grid map". In our view, the current formulation of the CCM's title to address the objective of transparency of information. We believe the CCM should be the occasion to publish the publication of grid elements characteristics to the benefit of ENTSO-E members (with a topology level at least equivalent to the level given on the ENTSO-E grid map). This publicity should be written explicitly in the CCM in order to comply with EL CACH Article 3, paragraph (7).		We take no view on your suggestion which we see as out of scope of the CCM. It should more appropriately be covered in connection with the methodologies related to operational security pursuant to SOGL. Therefore we shall not modify the CCM in light of the comment.	
0041_A	ELBLECTRIC	The following sentences were only part of ELBLECTRIC's comment to the CCM. Again, during the workshop we recognized as first step towards the CCM, "the publication of grid elements characteristics (length, resistance, reactance, internal capacity). For the CME region with a topology level at least equivalent to the level given on the ENTSO-E grid map". We strongly advocate that the level of details on transmission should be further aligned among TSOs.		The CCM covers processes at pan-European level. The decision on whether to exchange the data referred to in Article 19 (6) of Regulation 2013/1222 will be made at CCM level. Any additional capabilities should also be provided at CCM level. Therefore we will not follow your suggestion.	
0041_A	ELBLECTRIC	TSOs would report to their MWAs if they do not choose to follow the recommendations of the RSC.		The CCM covers processes at pan-European level. The decision on whether to exchange the data referred to in Article 19 (6) of Regulation 2013/1222 will be made at CCM level. Any additional capabilities should also be provided at CCM level. Therefore we will not follow your suggestion.	
0042_A	ELBLECTRIC	The three comments summarized here were not completely detailed, the ELBLECTRIC version was required as a separate document and dynamic calculation are not required, and it is up to the TSOs when a capacity calculation region is decided whether to do the job or not, due to the complexity of the project (see 507/948). We would appreciate if there is a requirement to mention to the MWAs and market parties if these calculations are performed in a region, why they are (not) performed and what the result is and if the overall result could be improved.		However, we will reformulate the legally binding passages so as to respect TSO discretion and so as to harmonize TSOs' approach in the following way: the default shall be for TSOs to use the non-breaker approach while preparing their RCM. Only where the cost (effort) of obtaining the degree of detail is not warranted, TSOs shall use the bus-branch approach instead.	
0047_A	Swedish Energy Agency	See above: since these calculations are complicated and costly it would make sense to report them, if they are done, why they are done and what the results are.		However, we will reformulate the legally binding passages so as to respect TSO discretion and so as to harmonize TSOs' approach in the following way: the default shall be for TSOs to use the non-breaker approach while preparing their RCM. Only where the cost (effort) of obtaining the degree of detail is not warranted, TSOs shall use the bus-branch approach instead.	
0048_A	ELBLECTRIC	The TSOs should report and justify to their MWAs which level of modelling topology they choose in their RCM if there are good reasons for choosing either the node-breaker or the bus-branch topology and no requirement to harmonize.		We will not address the point in more detail as this is not within scope of the CCM / GLDPM. Instead the manner in which capacity is made available to the market should be addressed in the capacity calculation methodology pursuant to Regulation 2013/1222 Article 21.	
0041_A	ELBLECTRIC	When the capacity calculation methodologies will be introduced, capacity calculation region level and any of the two versions of the CCM will be used appropriate region provisions for coordination between regions at the stage of the process. The requirement in 738 is not precise enough and does not take into account that not only trade within a region needs to be considered but also trade between regions.		We will not address the point in more detail as this is not within scope of the CCM / GLDPM. Instead the manner in which capacity is made available to the market should be addressed in the capacity calculation methodology pursuant to Regulation 2013/1222 Article 21.	
0091_A	EDF	EDF takes note that replicates and withdrawals at each node of the IGH/CM/CMs correspond to "realistic and accurate forecasted aggregate amount". Although the information has to be consistent with SOGL declarations, it should be considered as purely indicative and should not represent commercially-sensitive data.		We will not address the point in more detail as this is not within scope of the CCM / GLDPM. Instead the manner in which capacity is made available to the market should be addressed in the capacity calculation methodology pursuant to Regulation 2013/1222 Article 21.	
0091_A	EDF	In ENTSO's proposal, the RCM used to build the CCM does not include internal congestions and voltage violations. The approach does not seem to be consistent with the provisions of CACH Regulation (Article 35) on coordination of actions aimed to relieve congestions. EDF would therefore recommend to keep internal congestions within RCMs before merging, so that RSCs can propose measures to alleviate these congestions.		We do not agree with your interpretation of Article 25 which in paragraph 4 only provides these "unilateral or unconstrained rescheduling and counterbalancing measures" that are "of cross-border relevance". The draft SOGL also clearly distinguishes between those operational security violations that need to be managed in a coordinated way and those that do not. Therefore we will not be addressing this comment further in the methodologies.	
0091_A	ELBLECTRIC	When these variables are not mandatory at the European level, it would nevertheless be good to have an oversight when regions are performing these calculations/scenarios and why.		We appreciate your interest in this topic. However, we aim to keep coverage of the CCM / GLDPM focused on the pan-European level. Any additional information is out of scope of the CCM / GLDPM and should be provided at the relevant regional level. Therefore we will not incorporate your comment into the methodologies.	
1145_A	IFREC	IFREC is a proponent of harmonization, also of ECRs, to the extent that the additional benefits are in line with the additional costs. Harmonization should not lead to excessive costs just for the sake of harmonization if no additional value to RCMs and the CCM and the further integration of European power markets can be proven.		While we think, of course, that the harmonization in force, we wholeheartedly agree with your comment. For the sake of completeness we note that we do not understand your comment as suggesting changes to the document.	

1970

[illegible]

2132_A	REF	In order to 1) increase the provision of accurate data by SCRs until D-1, 2) allow market parties to schedule maintenance, and 3) strengthen the environment signals in relevant locations, TSOs should publish CGMs in their full extent (including forecasts on variable data and not only technical data) corresponding to all time horizons before D-1 (i.e. yearly, monthly, and weekly updates of the CGMs). As agreed by the speakers at ENTSO-E's workshop on February 14, there is no reason to keep CGMs data confidential before D-2, as they only represent TSOs forecasts. As regards limitations close to real time (D-2, D-1 and D0), publications could be limited to the best available forecast of cross-border capacity (i.e. Flow-based capacity and ITCs) to ensure market parties to better anticipate short-term evolution of market prices without having to disclose any confidential or sensitive information.	TSOs have regularly come to the conclusion that in connection with the CGM and GDDP methodologies no additional data can be requested. Please see our detailed explanation on this topic.	See note with footnote "transparency"
2516_A	LIBERECTIVE - SUGGESTION -	(This comment was originally submitted "General comment", but we believe that it should more appropriately refer to the CGM process - thus the adaptation to line 2516) The approach of the CGM seems to be to start the process based on an historical situation. This may lead to self-reinforcing properties as the incorporation of possible inefficiencies from the past. We suggest to start the process based on an unknown and CGM as input for all ITCs as first step of the iteration to avoid this.	The CGM process does not start based on a historical situation. The CGM process starts with the CGM Alignment which respects the requirements set out in Regulation 2015/1222 Article 18 (3). Consistent with your suggestion, in the CGM Alignment the CGM process effectively starts without constraints as the CGM Alignment can adjust the feasibility ranges submitted. Therefore we see no reason to modify the methodology in this respect.	
2586_A	LIBERECTIVE - SUGGESTION -	However there should be no discrimination of trade between different capacity calculation regions.	The capacity calculation methodology is a separate methodology that is out of scope of the CGM Alignment. Your comment should be related in connection with the public consultation of the capacity calculation methodology.	
2615_A	LIBERECTIVE - SUGGESTION -	This is not specific enough - if the dimension of the bidding zone is taken into account - will bigger zones have bigger advantages than smaller zones? Or does it mean the reverse? Will it lead to advantages of bigger zones compared to smaller zones in the matching process or not?	Thank you for the comment. We shall review the corresponding provision of the CGM Alignment to make it clear that the CGM Alignment requires adjustments proportional to a weighting factor. The weighting factor is supposed to reflect the "flexibility" available in a bidding zone to accommodate changes in the net position. In some cases, this may be considered as the "size" of the bidding zone - a larger bidding zone should find it easier to make a given adjustment in terms of MW. The algorithm takes "flexibility" / size into account, but it also aims to minimize the adjustment relative to the initial forecast (consequently not position). Therefore, a "smaller" bidding zone does not necessarily have to make a smaller adjustment than a "larger" bidding zone.	
2644_A	LIBERECTIVE - SUGGESTION -	If the calculation in the proceeding phase is done by the BSCs - how is it ensured that the BSCs cooperate with each other and that they also optimize the trade between BSCs not just within BSCs? We would appreciate an additional paragraph, describing the cooperation between BSCs in setting capacity for the markets.	We do not think it correct to speak of "advantages" for any party in that the CGM Alignment is designed to respect the requirements set out in Regulation 2015/1222 Article 18 (3). No bidding zone has an advantage in that the adjustment is designed to reflect the intrinsic value of each bidding zone.	
2679_A	LIBERECTIVE - SUGGESTION -	In scenarios should be added to that paragraph, saying that if the TSOs decide in their final bid from the recommendations of the BSC or the CGM result, they should report to the BSC why they chose to deviate.	The actual capacity calculation process is out of scope of the CGM Alignment, as it is the responsibility of BSCs during that process. Therefore we see no need to revise the CGM Alignment in the light of this comment. As for the cooperation between BSCs during the CGM Alignment, the CGM Alignment will be a central IT system accessible to all BSCs; each BSC would in principle be able to operate the module, and the CGM Alignment process relies on a unique and transparent methodology shared by all TSOs. However, this is already explained in the CGM Alignment, so we see no need to revise the document.	
2932_A	REF	The submission of SCRs in the short time horizon (D+1 and D0) should be totally transparent towards market participants. As regards the year ahead submission, where no submission rules are envisaged, TSOs and BSCs should be accountable for the timely provision of SCRs.	Please refer to the answer to comment 2501_A	TSOs submissions shall be documented and the corresponding statistics shall be regularly published; this requirement shall be added to the quality monitoring chapter
2949_A	REF	The submission of SCRs for the short time horizon (D-1) and weekly should be totally transparent towards market participants and should be at least notified to the competent regulatory authorities. For the long term horizon (year ahead), where non submission rules are applied, TSOs or BSCs should be accountable for the submission process used to submit all SCRs at European level.	These are helpful suggestions. We will address the first point on the submission of SCRs in connection with quality monitoring and we will make the mandatory character of the timely provision of SCRs (not only the longer-term ones) clear.	The legally binding passages of the CGM Alignment shall make clear the mandatory character of the timely provision of SCRs (i.e., SCRs for all time horizons).
3026_A	LIBERECTIVE - SUGGESTION -	According to the specific decision implemented in the D-1 horizon, at 19:00, the weighted CGM for all scenarios will be available on OPHS and is expected that the remedial actions (logical measures), if necessary, will be included in the next SCRs at 21:15. We consider that it is very important to enhance the length of proceedings because this deadline could be incompatible with normal units start-up processes, thereby reducing the number of units that could be selected to participate in the bidding process.	Please refer to the answer to comment 2932_A	
3273_A	LIBERECTIVE	Section 8 of the consultation document mentions that BSCs are responsible for the quality check of SCRs and CGMs. In our view, the indicators proposed in Sections 8.7 and 8.8 are more related with "completeness" of the SCRs and CGMs than with the "accuracy" of forecasts and scheduled data (i.e. to what extent these forecasts are close to real time events). Country to what is proposed for Generation and Load Data (line 4715). Notwithstanding the fact that SCRs, CGMs, and Generation and Load Data are subject to forecast errors by their nature, it would be relevant in our view to define key performance indicators related with the accuracy of SCRs and CGMs. These indicators could then be periodically checked and corrected, enabling an interested parties to improve their own approaches.	The deadlines proposed reflect the operational requirements of all TSOs involved in the CGM Alignment following intense discussion. We appreciate your suggestion that the process be sped up, but will not be able to modify the deadlines for the time being. Therefore, we shall not be revising the CGM Alignment in the light of your comment.	
3379_A	REF	Section 8 of the consultation document mentions that BSCs are responsible for the quality check of SCRs and CGMs. In our view, the indicators proposed in Sections 8.7 and 8.8 are more related with "completeness" of the SCRs and CGMs than with the "accuracy" of forecasts and scheduled data (i.e. to what extent these forecasts are close to real time events). Country to what is proposed for Generation and Load Data (line 4715). Notwithstanding the fact that SCRs, CGMs, and Generation and Load Data are subject to forecast errors by their nature, it would be relevant in our view to define key performance indicators related with the accuracy of SCRs and CGMs. These indicators could then be periodically checked and corrected, enabling an interested parties to improve their own approaches.	These are helpful suggestions in that the publication of quality indicators could improve the CGM Alignment. We shall, for the time being, use statistics on quality indicators and regularly publish these: an on-site vs. on-post completion of net positions as quality indicators and regularly publish these.	Reverse chapter on quality monitoring and require TSOs to regularly publish statistics on SCR submissions as well as on-site vs. on-post completion of net positions as quality indicators.
3483_A	REF	TSOs should elaborate and make public some key performance indicators to evaluate the accuracy of SCRs and CGMs. This helps transparency effort would be useful to allow all interested parties to improve their own submissions and to contribute to the improvement of the methodologies and the submissions used by TSOs with a bundle in terms of efficient coordination of the bidding process.	Please refer to the answer to comment 3379_A	
3489_A	REF	The general implementation framework presented during the ENTSO-E workshop of February 18th should be included for the sake of transparency in section 3 of the draft methodology. Furthermore, if MWs require some amendments of the methodology before their approval, relevant periods should be informed to be able to adjust and to ensure the implementation of the requested evolutions.	The framework for implementation will be revised relative to the version shown at the workshop, so we do not want to follow your suggestion as this would lead to incorporating outdated material into the methodology.	Ensure that stakeholders are kept informed on the approval process and any possible amendments requested via the ENTSO-E website and email newsletter.

2016-05-03

197-06-150

[illegible]

5/16/2016

3917_A	SSE, EURELECTRIC	The proposed approach of having "each requirement set out in the methodology individually" does not provide in one of the blocks of legislation is very welcome. It makes for a clear audit trail from the methodology to the appropriate Guidelines / Network Code etc. As per the comments above under 3711, where this is done it would be helpful just to show the Article / paragraph to which the methodology obligation relates via a footnote.	Please refer to the answer to comment 3711_A		
3917_A	SSE, EURELECTRIC	Given the legal nature of the methodology, should "refer" be changed to "shall"?	There is no for the suggestion which we shall implement because it may improve the clarity of the document.		Revised the sentence in line 3921 of art. 9 of the GLDPM such that it reads: "Finally, unless otherwise stated, material included in an annex to the present methodology is not intended to be legally binding and does not, therefore, require approval by all participating stakeholders."
3929_A	SSE, EURELECTRIC	The statement that any "reasonable" adjustment by a TSO of the deadline "shall not be considered an amendment in the sense of GL CACM Article 9 (12) and shall not require its submission of the present methodology for approval" is (1) wrong legally and (2) unacceptable from a stakeholders perspective. In respect of (1) as noted in line 3932, generators or third parties have to provide the data specified within the specified deadline. If that deadline can, unilaterally, be changed at the whim of the TSO then it will not be possible for a generator or third party to know what (s) the revised deadline is and / or (b) if, practically, they have the IT systems etc., that can provide the data to meet the revised deadline. In respect of (2) any change to the deadline has a material effect on stakeholders. Whilst a TSO may (from their perspective) consider such a change to be "reasonable" this cannot be the case for stakeholders. It must be remembered that the methodology will be approved based on the deadlines set by TSOs. If subsequently any changes to a deadline are not subject to the approval process then there is a serious risk that TSOs could (repeatedly) include "their" or "artificial" deadlines in the methodology they present for approval in the regulatory framework, knowing that, after a few years, they have approved them could (unilaterally) change the deadlines to what they actually want - i.e. their own deadline, and they have known to stakeholders and the regulatory authorities prior to the methodology being approved, that they have had the methodology not being approved.	We will take into account your comments because the ensures that the interests of data providers are taken into account in a more appropriate manner. However, as far as the specific line that you refer to is concerned the question is a direct question from legislation which we would not want to modify.		Revised the GLDPM in the following way: (1) the GLDPM shall specify default deadlines for data providers; (4) when publishing Article 16 (4) (c), each TSO may deviate from the default deadline in a way that is not concerning for data providers than the default deadline, but it shall not concern concerning deadlines; (5) if, at any point in time, the TSO wishes to revise the deadline in a way that is more concerning for data providers it shall do so following the relevant provisions regarding the requirement to publish a standardised consultation and a possible requirement for WGA approval is concerned.
3938_A	EURELECTRIC	and "if the data is not already available otherwise" to avoid double recording	We will take into account your comments because the ensures that the interests of data providers are taken into account in a more appropriate manner. However, as far as the specific line that you refer to is concerned the question is a direct question from legislation which we would not want to modify.		See note with following principles for revision of GLDPM
3941_A	EURELECTRIC	and "if the data is not already available otherwise" to avoid double recording	Change into the answer to comment 3938_A		
3975_01	EURELECTRIC	concerns sub-line 01	Change into the answer to comment 3938_A		
3975_21	SSE, EURELECTRIC	concerns sub-line 21	Please refer to the answer to comment 3705_A		
3975_22	SSE, EURELECTRIC	concerns sub-line 22	Please refer to the answer to comment 3705_A		
3975_23	SSE, EURELECTRIC	concerns sub-line 23	Please refer to the answer to comment 3705_A		
3975_45	SSE, EURELECTRIC	concerns sub-line 45 and 47	Our preferred term ("Primary data owner") is not the one defined in the Transparency Regulation ("Primary owner of the data"). Therefore, we had included both. We shall follow your suggestion because it makes the document clearer and removes "Primary owner of the data"		Remove "Primary owner of the data" from the list of definitions.
3975_59	EURELECTRIC	concerns sub-line 59	Your should refer to the year before the year of delivery. The year of delivery is T, e.g., 2016. Therefore, the year before the year of delivery is 2015 (i.e., T-1). We note, for the sake of completeness, that we see no need to request to modify the document in light of your comment.		See note with following principles for revision of GLDPM
3978_A	IPREC	With respect to the GLDPM, covering the transfer of data on load and generation between the TSOs, IPREC would open up a pragmatic approach, as the methodology covers not only power generating modules (types B, C, D), but also all transmission connected demand facilities, closed distribution systems as well as all relevant demand facilities under the SCOD, which might also include all demand facilities delivering demand side response, up to the smallest unit. The goal of the GLDPM (and the SCOD and in general all relevant codes and guidelines) should be to provide the framework needed to allow for the integration of the European power markets, but should not create additional entry or operational barriers and conditions (even for existing generation and demand facilities as well as CDSs), which would hamper the above goal and the main goal of the European Commission. The approach presented by ENTSO-E, with an implementation of the GLDPM on a local level by the local TSOs, where they shall make use of existing processes and mechanisms as much as possible, is an important step in the good direction. However, as also determined by ENTSO-E, the GLDPM provides a framework for data that is actually needed and used, in order to make the best use of the data for all actors, and the whole also applying those standards and conditions that are needed to make the best use of the data for all actors, and the whole perspective and context matters. IPREC also reiterates its position on the model reduction for CDSs in the deliverability of the TSOs, open to take a pragmatic approach.	Thank you for your encouraging reminder. We shall revise the GLDPM as described in the note referred to on the right. As your comment requests we shall make it clear that the direct reference of once shall be requested because the reduces the burden on data providers while allowing the TSOs to meet their legal obligations.		
4001_A	EURELECTRIC	In order an independent party should be in charge to check and verify that data availability	We agree with your suggestion because it provides reassurance to data providers that they will not be asked to incur costs unnecessarily; we have therefore included the principle that you refer to in our proposal for revision of the GLDPM. Please see the note referred to on the right.		See note with following principles for revision of GLDPM
4002_A	SSE, EURELECTRIC	As to the end of the paragraph, TSOs will seek views from primary data owners about other existing data sources, such as the provided under REMIT and / or the Transparency Platform as well as existing national arrangements; that can be used to avoid any redundancies of primary data owners needing to duplicate data flows.	We agree with your suggestion because it provides reassurance to data providers that they will not be asked to incur costs unnecessarily; we have therefore included the principle that you refer to in our proposal for revision of the GLDPM. Please see the note referred to on the right.		See note with following principles for revision of GLDPM
4032_A	ENABEL, EURELECTRIC, AMOZIMAR	and other types of types (e.g., aggregators)	Thank you for your suggestion. We shall be adding aggregators (both of generation units and of demand facilities) to the list of data providers whose data may be required in order to build fully		See Aggregators (both of generation units and of demand facilities) to the list of data providers whose data may be required in order to build fully

10-131

[illegible]

4090_C	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	No guarantee of harmonization The GLDPM document also gives the TSO the freedom to define its own requirements. On page 42: "Therefore, data on forecast active power output and active power reserves shall also be provided on a (2) basis along with any other information the TSO deems relevant." In addition, several paragraphs in the GLDPM consultation are unclear: "As precise as possible, a breakdown of installed capacity on a local level"; "Expected changes to structural data for the relevant time horizons"; "Power generating facility owners might be asked to indicate whether their power generating facility ... (p. 42)"; "The original purpose of the network codes was to improve security of supply and develop the internal energy market through a harmonised set of rules. The consultation of setting such TSO design its own data requirements, and the lack of clarity of the proposed methodology will likely lead to very different methodology being used for each internal grid market. These various models then risk not to be reconcilable in a common grid model." "The present methodology does not raise objections to owners / primary data owners designating their data provision basis as listed parties as long as the local TSO agrees with this and as long as the responsibility for the data being provided in time and in the right quality remains with the owner / primary data owner" It should say: "The present methodology does not raise objections to owners / primary data owners designating their data provision basis as listed parties as long as the local TSO agrees with this and as long as the responsibility for the data being provided in time and in the right quality remains with the owner / primary data owner" Local TSOs should not have the right to deny to a certain owner primary data owner the designation of the data provision basis (see comment line 4137) (also concerns line 4137) In relation to the previous comment, for structural data, the draft methodology mentions (L 50 (Article 46(2)) setting a minimum update deadline in real time "no later than the first commissioning or any changes to the existing installation" and foresees a general obligation for data owners to keep data "updated as soon as practicable". We suggest a slight amendment of line 4121 in order to avoid undue burdens on data owners: "keeping information up-to-date, as soon as reasonably practicable." In terms of the requirement set out here is unclear than similar provisions ... and supersede those less strict provisions (see comment line 4125) Let us call this "methodology". To avoid confusion, we do not state it is possible for the TSOs (even with NGA approval) to create binding requirements in a voluntary document (the methodology) which supersedes those requirements agreed in accordance with the Treaties of the Union.	We will take into account your comment because the comments that a number of Regulators concerns that stakeholders may have with respect to the GLDPM are addressed. Please see the note referred to on the right.	See note with thematic principles for revision of GLDPM
4110_A	EURELECTRIC	The revised GLDPM shall make it clear that designation of basis related to data provision is to be governed by the participant set out in Regulation 2015/1222 Article 31. We believe that this would address your comment in a suitable manner. Please see the note referred to on the right.	The revised GLDPM shall make it clear that designation of basis related to data provision is to be governed by the participant set out in Regulation 2015/1222 Article 31. We believe that this would address your comment in a suitable manner. Please see the note referred to on the right.	See note with thematic principles for revision of GLDPM
4121_A	EEF	We do not want to implement that suggestion because it might give way to discussions on what "reasonably practicable" is as opposed to "practicable". "Practicable" is not "reasonably" and it is not "as soon as possible". The revised GLDPM shall provide for a reference for the NGA, so that should any concerns in this respect, please see the note referred to on the right.	We do not want to implement that suggestion because it might give way to discussions on what "reasonably practicable" is as opposed to "practicable". "Practicable" is not "reasonably" and it is not "as soon as possible". The revised GLDPM shall provide for a reference for the NGA, so that should any concerns in this respect, please see the note referred to on the right.	See note with thematic principles for revision of GLDPM
4125_A	SSE, EURELECTRIC	The consultation in the current version of the GLDPM is misleading, sorry. We shall make it clear that the methodologies are not supposed to modify other legislation. However, the requirement that we seek to set is related rather than those in the SDC, and we do believe that this is justified by the specific data to which the data will be put under the GLDPM and Regulation 2015/1222. The requirement set out here is unclear than similar provisions ... and supersede those less strict provisions ... to read "The requirement set out here is clearer than similar provisions". For example, GL SO (2015 11 27) Article 43 (4) (which, in the case of structural information on distribution grids only requires the TSO to "provide the TSO with an update of the structural information (...) at least every six months") and supersede those less strict provisions ... to read "The requirement set out here is clearer than similar provisions". For example, GL SO (2015 11 27) Article 43 (4) (which, in the case of structural information on distribution grids only requires the TSO to "provide the TSO with an update of the structural information (...) at least every six months"). The stricter requirement under the GLDPM is justified by the specific uses to which the data will be put under the GLDPM and Regulation 2015/1222."	Repeat the sentence "The requirement set out here is clearer than similar provisions in, for example, GL SO (2015-11-27) Article 43 (4) (which, in the case of structural information on distribution grids only requires the TSO to "provide the TSO with an update of the structural information (...) at least every six months") and supersede those less strict provisions ... to read "The requirement set out here is clearer than similar provisions". For example, GL SO (2015 11 27) Article 43 (4) (which, in the case of structural information on distribution grids only requires the TSO to "provide the TSO with an update of the structural information (...) at least every six months"). The stricter requirement under the GLDPM is justified by the specific uses to which the data will be put under the GLDPM and Regulation 2015/1222."	See note with thematic principles for revision of GLDPM
4129_A	SSE, EURELECTRIC	TSO may agree on alternative arrangements with its data providers subject to the TSO meeting its own responsibilities we have the other TSOs. As per Article 6(5) of the TSOs, the National Regulatory Authorities should be involved. Amend this line to read "... TSO may, subject to NGA approval, agree on alternative arrangements with its data providers."	The revised GLDPM shall provide for a reference for the NGA, please see the note referred to on the right. However, we would not want to impose the specific requirement for NGA approval even in those cases in which all parties involved are happy with the "alternative arrangements" as this would create extra work without any additional benefit (since, by assumption, all parties involved have no objections). We trust that this addresses your comment in an appropriate manner.	See note with thematic principles for revision of GLDPM
4133_A	SSE, EURELECTRIC	"An individual TSO may set stricter deadlines..." Firstly, as per the comments under 4125, we are not certain that this is legally permissible in terms of the Meroni Doctrine. Secondly, even if legally permissible, as per 39(9) the subsequent unilateral amendment by the TSOs of deadlines after the methodology has been approved by NGA is unacceptable from a stakeholders perspective.	Please refer to the answers to comments 39(9) A and 4125_A.	
4134_A	EEF	(also concerns line 1380) The line 4130 refers to "TSO's deadlines" and to "an indication of the windows within which they (data providers) will have to make their data available to the TSO". Yet, the deadlines for the provision of data from SOs are not clearly mentioned in the draft GLDPM methodology, while Article 16(4) of CACI Regulation provides that: "The methodology shall specify the deadlines applicable to generation units and loads for providing the information". The draft methodology seems to propose to local implementation TSOs' decisions on these deadlines to ensure consistency with local market rules. Nevertheless, EEF believes that all the deadlines imposed to data providers should be in any case submitted to public consultation before their final approval by NGA in accordance with Article 16(4) of CACI Regulation. Therefore, we propose to include the obligation to consult market parties, if TSOs specify deadlines for data provision at local level. In such case, stakeholders should be consulted and TSOs should take into account their views and in any case provide justification of their proposal" (to be added after line 4135).	Your comments reflect reasonable concerns that data providers may have and we therefore propose to take them into account by revising the GLDPM based on the outline referred to on the right.	See note with thematic principles for revision of GLDPM
4135_A	Stakeholders, EURELECTRIC	If a TSO sets stricter deadlines it should be required to provide a justification for those stricter deadlines.	Your comments reflect reasonable concerns that data providers may have and we therefore propose to take them into account by revising the GLDPM based on the outline referred to on the right.	See note with thematic principles for revision of GLDPM

[illegible]

13 of 1003

4247 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	Since the CDM is foreseen for voltage levels at 220 kV and above, the possibility of TSOs providing aggregated data with respect to aggregated and load forecast should be included in the methodology. A list of required data should be given in order to be able to compare. It is to be noted that generation forecasts from type A providers should be included in the current balance settlement run in the Dutch Market. The methodology (starting 10/2016) these are not needed from generators aggregated in transmission domain (type A) (type A). The should remain the case in the future data.	Please refer to the answer to comment 4231 A		See note with literature 'principles for revision of GLDPM'
4249 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	It is not necessary or appropriate for DSOs to provide the forecasts. DSOs are providing the standing data. TSOs are not providing the forecasts. It is not necessary or appropriate for DSOs to provide the forecasts. DSOs are providing the standing data. TSOs are not providing the forecasts. It is not necessary or appropriate for DSOs to provide the forecasts. DSOs are providing the standing data. TSOs are not providing the forecasts.	As for different TSOs specific data requirements, TSOs shall determine these based on the GLDPM as it is. If the TSOs do not require the data year commitment, then they should not ask for these. However, remember that we are asking together a maximum list of data that addresses all requirements that any TSO anywhere in Europe may have. For the sake of completeness, we note that we are asking your comment by revising the GLDPM based on the requirements of the TSOs.		
4249 B	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	It is not necessary or appropriate for DSOs to provide the forecasts. DSOs are providing the standing data. TSOs are not providing the forecasts. It is not necessary or appropriate for DSOs to provide the forecasts. DSOs are providing the standing data. TSOs are not providing the forecasts.	Your comment proposes a more efficient selection of data between TSOs and DSOs, as in the revised GLDPM we will assign the responsibility for generation forecasts for FCRs that are modelled in the GLDPM to TSOs.		The GLDPM shall assign the responsibility for preparing generation forecasts for power generating modules that are modelled in the GLDPM to TSOs.
4254 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Thank you for the endorsement! However, we will unfortunately have to remove MEMOs and problems with the GLDPM for the reasons. For the sake of completeness, we note that the reason that we will have to remove the GLDPM is a way that goes against the spirit of your comment.		
4301 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	To avoid duplication of communication channels and unnecessary reporting burdens on providers, available data should be transferred between (distribution and transmission) system operators.	Thank you for the endorsement! However, we will unfortunately have to remove MEMOs and problems with the GLDPM for the reasons. For the sake of completeness, we note that the reason that we will have to remove the GLDPM is a way that goes against the spirit of your comment.		
4327 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	TSOs' protocols of terms and conditions and methodologies deriving from Guidelines and Network Codes are often made to have significant impacts on grid users and market participants, so that the proposed solutions should be backed by robust justifications and cost-benefit analyses, within context.	Please refer to the answer to comment 1407 A		
4327 B	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The GLDPM seems to imply that TSOs will collect large volumes of data and then select the most relevant information. This approach will create unnecessary data collection costs and complicate recent European efforts towards more data privacy and security.	We do not agree with the first sentence. Contrary to what you write, each TSO shall collect only the information that it really needs. We will take into account your comment by clarifying that principle as described in the outline referred to on the right.		See note with literature 'principles for revision of GLDPM'
4353 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	For instance, the General Data Protection Regulation (to be adopted this spring) set the principles of data protection by design and by default for personal data. The controller shall implement mechanisms for ensuring that, by default, only those personal data are processed which are necessary for each specific purpose of the processing, and are especially not collected or retained beyond the minimum necessary for those purposes, both in terms of the amount of the data and the time of their storage. ¹	As noted above, we agree with your suggestion that TSOs shall obtain only the data they need. The data described in the GLDPM are not meant to be obtained by each TSO; these data constitute a maximum list from which each TSO can obtain basic data that it needs in order to need to legal obligations. Each TSO shall create otherwise which data it needs.		
4353 B	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 C	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 D	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 E	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 F	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 G	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 H	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 I	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 J	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 K	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 L	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 M	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 N	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 O	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 P	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 Q	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 R	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 S	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 T	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 U	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 V	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 W	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 X	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 Y	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4353 Z	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The use of data already provided by parties to other networks or providers is a welcomed inclusion. The model depiction of data which might otherwise, inadvertently, lead to double counting.	Please refer to the answer to comment 1407 A		
4418 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	The network reduction approach appears to be the lightest in terms of IT processing power, and the easiest to implement. For decades, field efforts were made to reduce data for grid analysis without losing accuracy and value for flow analysis. To reduce complexity, Thomson equivalents of modelling and underlying systems were (and are) used. Significant DSOs could support the approach by delivering aggregated data on DSO-connected units to TSOs. DSOs would ensure that the aggregated values (e.g. load, generation by type) are correct and check the consistency of all delivered data. The model of interaction is favoured by DSOs, who in any case need to collect data for their own system operations. Member States may deviate from the methods if it involves high total costs to fully comply with the methods described in the document, as long as the overall intention can be met.	Thank you for the comment which we read as suggesting that TSOs should not ask for more data than they need. Since this is a reasonable principle which would reduce costs for data providers, we shall revise the GLDPM in line with the outline referred to on the right.		See note with literature 'principles for revision of GLDPM'
4433 A	ELB/ELECTRIC / DEMAND / ELECTRIC / DEMAND	It is not clear how data is handled if also type B generation are connected to the DSO? Will there be a data exchange between TSO and DSO in both directions?	Data exchange between TSOs and DSOs is covered in the SOG, and is out of scope of the GLDPM / GLDPM. This draft SOG explicitly provides for double reporting. However, cooperation between TSOs and DSOs with respect to third-party data is out of scope of the GLDPM / GLDPM. We shall revise the GLDPM in order to make it clear that, in principle, an obligation to provide data under the GLDPM entails the obligation to provide these data directly to the TSO.		We shall revise the GLDPM in order to make it clear that, in principle, an obligation to provide data under the GLDPM entails the obligation to provide these data directly to the TSO.

744-1-131

4443_B	ENERGY ENERGY ASSOCIATION	What are the chances of "primary energy source" needs to be in line with the way data is collected at national level.		Thank you for the observation. The main types of "primary energy source" should be the same across all national jurisdictions, covered by the GLPDM. In fact, all of these should be based on or derived from the EMIP classification, so we are confident that if everyone uses their national classification of "primary energy source", it should be possible to get the resulting data sets for building EPIs / CO2s (potential minor discrepancies in definitions notwithstanding). Therefore we shall not revise the methodology in light of your comment.	See note with footnote "principles for revision of GLPDM"
4443_A	ENERGY ENERGY ASSOCIATION	Who determines the necessity of the data if TSO and DSO don't agree? The right to demand data is additional data is a separate. There needs to be a balance of what data is actually needed and what is realistic to get with reasonable effort and costs.		We agree that TSO discretion shall be circumscribed and we will revise the GLPDM accordingly. The GLPDM shall contain a minimum list from which TSO shall request only what it needs. We also agree that there should be a reform in case of disputes. Since your comments are at improving the clarity of the methodology and ensuring that the burden for data providers is kept reasonable, we shall incorporate them into the GLPDM by revising the methodology based on the outline related to the above.	See note with footnote "principles for revision of GLPDM"
4443_A	ENERGY ENERGY ASSOCIATION	"is replaced by". As per the comments above under 4442, 4425 and 4433 I am not certain that under the present structure it is really possible to replace a single set of data.		Applicable reference topology refers to the expected configuration of the corresponding distribution grid, where requested this is needed in order to accurately model the overall grid and prepare the corresponding EPI. In order to improve the clarity of the methodology we shall incorporate your comment by replacing the term "applicable reference topology" as the expected configuration of the corresponding distribution grid.	See note with footnote "principles for revision of GLPDM"
4443_A	ENERGY ENERGY ASSOCIATION	Planned working interruptions or outages due to faults? Needs clarification. Network needs to be defined (SW or other)?		The type of outage is irrelevant; all outages of "relevant DSO assets" have to be signalled to the TSO. For that reason we shall not revise the GLPDM in the light of that part of your comments.	See note with footnote "principles for revision of GLPDM"
4443_A	ENERGY ENERGY ASSOCIATION	Setbacks or real-time status? The latter, not necessarily possible to provide. Since tap positions will not always be available, add "where available" to the text.		As for new "relevant DSO assets" are defined, the criterion is the one formulated in Regulation 2015/1222 Article 15 (3): "relevant assets are all those assets which are used in regional operational security analysis. We shall take your comment into account by referring to Article 15 (3) explicitly as this will improve the clarity of the methodology.	See note with footnote "principles for revision of GLPDM"
4443_B	ENERGY ENERGY ASSOCIATION	Tap positions will not always be available. Add "where available" to the text.		This data item refers to the voltage set point for the transformer, more specifically, the impact set point which should always be available / known. This is not about real-time data. We shall take into account your comment (because it improves the clarity of the methodology) by stating that real-time data are out of scope of the methodology. Please see the outline referred to on the right.	See note with footnote "principles for revision of GLPDM"
4443_A	ENERGY ENERGY ASSOCIATION	Why is this information needed if reactive power requirements need to be met in connection point?		Please refer to the answer to comment 4442_A	
4443_A	ENERGY ENERGY ASSOCIATION	Q1 of Q3 (concerns lines 4444 to 4449). We see several issues with the GLPDM, p. 29, line 4444-4449, where DSOs are made responsible for providing day-to-day programs, per market time unit (15 min resolution), of consumption and production on a model level (represented as every 13/190 MW, 132/20 MW and 132/20 MW station). This will be an extensive and completely new task for the DSOs in Denmark, which is not covered by the Danish TSOs.		Our methodology does not formulate reactive power requirements. The information on the expected set of resources and capabilities is required for the proper modelling of the grid. As this is generally the same for all countries in the GLPDM we shall not be revising the document in light of your comment.	
4443_B	ENERGY ENERGY ASSOCIATION	Commenting the task of making the programs at the TSO (as it today) looks quite advantages. 1) as the programs hereby are made from the same uniform methodology, data-structure, IT-format etc. 2) as it is much easier to pass demands on the quality of the programs if it is placed at one entity, than on several DSOs as it would be the case in several countries. 3) In most countries, the TSO is a single entity that will have access to all data on consumption and production in its territory. In regard to the social value, should DSO's, by these new rules, be forced to make these day-to-day programs. Placing the task at the TSO would be more cost effective and require fewer resources than at DSO level. The rules should be open to local national arrangements, where the most cost-effective arrangement, on a societal level, can be chosen.		Please refer to the answer to comment 4449_B	
4443_C	ENERGY ENERGY ASSOCIATION	Q2 of Q3 (concerns lines 4444 to 4449). Comparing the task of making the programs at the TSO (as it today) looks quite advantages. 1) as the programs hereby are made from the same uniform methodology, data-structure, IT-format etc. 2) as it is much easier to pass demands on the quality of the programs if it is placed at one entity, than on several DSOs (as it is the Danish case). 3) as the Danish TSO (Energinet.dk), is the single entity in Denmark, that will have access to all Danish data on consumption and production in its territory, via their "datahub", by 2020. In regard to the social value, should the Danish DSO's, by these new rules, be forced to make these day-to-day programs, probably 7-3 min would be occupied at each DSO = 120-180 min. Placing the task at the TSO (as it is today) only 3-5 min would be needed (as far as we are told by Energinet.dk). This clearly shows that the rules should be open to local national arrangements, where the most cost-effective arrangement, on a societal level, can be chosen.		Please refer to the answer to comment 4449_B	
4443_D	ENERGY ENERGY ASSOCIATION	Q3 of Q3 (concerns lines 4444 to 4449). Finally, on a medium- to long-term horizon, we are very worried that the TSO could be forced (due to reduced economics or other reasons, internal as well as external) to use the GLPDM to supply demand that the DSOs (leaving over the task of making these comprehensive programs) despite the fact that it is socio-economic ineffective.		Please refer to the answer to comment 4449_B	
4443_E	ENERGY ENERGY ASSOCIATION	Q3 of Q3 (concerns lines 4444 to 4449). Finally, on a medium- to long-term horizon, we are very worried that the (Danish) TSO (Energinet.dk) could be forced (due to reduced economics or other reasons, internal as well as external) to use the GLPDM to supply demand that the DSOs (leaving over the task of making these comprehensive programs) despite the fact that it is socio-economic ineffective.		Please refer to the answer to comment 4449_B	
4443_A	ENERGY ENERGY ASSOCIATION	Not clear how data is needed / also type 9 generators are connected to the DSO; will there be a data exchange between TSO and DSO in real time?		Please refer to the answer to comment 4431_A	
4443_B	ENERGY ENERGY ASSOCIATION	The TSO is in just as good a position to provide this demand. There is no merit in forcing the DSO to attempt it.		Please refer to the answer to comment 4449_B	

15/03/2016

4465_C	CEECRC / EDESO for Smart Grids / EURELECTRIC / GROUPE	On page 30, the GLDPM states that it would be inappropriate to impose reporting obligations on owners of type A power generating modules. However, a few lines later, the reporting obligation is assigned to the corresponding DSO, but the DSO does not get any means to impose this reporting obligation on the owners of type A power generators. To impose an obligation without a means to fulfil it, but with a sanction when the obligation is not met, is unfair and could harm TSOs.	Please refer to the answer to comment 4297_B	
4466_A	EUROPEAN ENERGY SENSATION	production forecasts not required in the new Nordic Balancing System model from generators designated as "small-scale" producers. This should be clarified in the GLDPM.	Please refer to the answer to comment 4299_B	
4483_A	EURELECTRIC	(same comment as made with respect to line 4566 and 4567) How should data be provided if the generation module is multi-fuel and the primary energy source changes e.g. by wind and solar?	Please refer to the answer to comment 4299_B For the sake of completeness we note that we shall not be making the GLDPM in light of your comment. The FAQ document available at: http://www.entsoe.eu/Documents/FAQs/FAQs%20Platform%20Transparency%20Principles%20for%20revision%20of%20GLDPM	
4484_A	EURELECTRIC	How is cold and warm start defined, especially with respect to temporarily mobilised units?	The intent of the GLDPM in these places of information is to learn how long it will take for a generation unit to become fully operational given a certain starting condition. As for the exact definition of the starting condition (warm start, cold start, start from shutdown state), all generation units should use the criteria agreed with their local TSO. Since this would provide additional clarity, we shall incorporate your comment by adding in the GLDPM that, where required, as part of national implementation TSOs shall also provide additional clarification of definitions etc. See outline referred to in the FAQ document available at: http://www.entsoe.eu/Documents/FAQs/FAQs%20Platform%20Transparency%20Principles%20for%20revision%20of%20GLDPM	See note with filename "Principles for revision of GLDPM"
4500_A	EURELECTRIC	(same comment as made with respect to line 4483 and 4531) How should data be provided if the generation module is multi-fuel and the primary energy source changes e.g. by wind and solar?	Please refer to the answer to comment 4483_A	
4521_A	Swedish Energy Markets Inspectorate	If a power generating module is connected to the distribution grid, the data should be provided to the relevant DSO, who then has to provide it to the TSO. Double reporting to both the DSO and the TSO is not acceptable.	Data exchange between TSOs and DSOs is covered in the SOGL and is out of scope of the GLDPM / GLDPM. The draft SOGL explicitly provides for double reporting. However, cooperation between TSOs and DSOs with respect to third-party data is out of scope of the GLDPM / GLDPM. We shall revise the GLDPM in order to make it clear that, in principle, an obligation to provide data under the GLDPM entails the obligation to provide these data directly to the TSO.	
4533_A	EURELECTRIC	(same comment as made with respect to line 4483 and 4500) How should data be provided if the generation module is multi-fuel and the primary energy source changes e.g. by wind and solar?	Please refer to the answer to comment 4483_A	
4536_A	SOE	It is requested by: As per the comments above under 4529, 4535, 4537 and 4551 I am not certain that under the current GLDPM it is legally permissible to require a double set of data.	Thank you for the observation. It is unfortunate that our translation gave the misleading impression that we meant to revise the SOGL and "require" a requirement set out therein. We just meant to say that the GLDPM files, in this instance, an advice frequency that is different from the advice frequency set out in SOGL (2015-11-27). The revised GLDPM shall be clear in this respect. Please refer to the answer to comment 4538_A	
4554_A	EURELECTRIC	(same comment as made with respect to line 4566) Data should be taken from the ENETP	Where data are already available via ENETP or REMIT, data providers shall not have to provide these data directly to TSOs a second time. Instead the responsibility for delivering these data shall be the TSOs. Because your comment would reduce the burden on data providers in a reasonable manner, we shall incorporate it into the GLDPM by revising the methodology in line with the outline referred to in the FAQ.	See note with filename "Principles for revision of GLDPM"
4554_B	ENTSO-EURON, Swedish Energy Markets Inspectorate	It should be enough to report according to REMIT (or as we in Nordic call report market message (LMP)), they should avoid double reporting of same things to ACER and to ENTSO-E and to the Markets	Please refer to the answer to comment 4554_A	
4555_A	ENTSO-EURON, Swedish Energy Markets Inspectorate	It should be enough to report according to REMIT (or as we in Nordic call report market message (LMP)), they should avoid double reporting of same things to ACER and to ENTSO-E and to the Markets	Please refer to the answer to comment 4554_A	
4556_A	ENTSO-EURON, Swedish Energy Markets Inspectorate	It should be enough to report according to REMIT (or as we in Nordic call report market message (LMP)), they should avoid double reporting of same things to ACER and to ENTSO-E and to the Markets	Please refer to the answer to comment 4554_A	
4564_A	ENTSO-EURON, Swedish Energy Markets Inspectorate	If a power generating module is connected to the distribution grid, the data should be provided to the relevant DSO, who then has to provide it to the TSO. Double reporting from the generators to both the DSO and the TSO is not acceptable.	Please refer to the answer to comment 4531_A	
4566_A	EURELECTRIC	(same comment as made with respect to line 4554) Data should be taken from the ENETP	Please refer to the answer to comment 4554_A	
4575_A	ENTSO-EURON, Swedish Energy Markets Inspectorate	D-2 data should not be demanded as those forecasts are not very accurate, also I see a risk that TSOs will start to consider changes to those values as "not allowed" in worst case. The second part of the sentence read "D-2 prognosis should in any case not seen as a binding schedule for SOGL" in the Energy Markets comment.	TSOs are well aware that the D-2 information requested - "Technical active power curve and active power reserve" is non-binding and should only be reported for forecasting. Nevertheless, in line with Regulation (EU) 2013/1222 Article 18 (3) (d) TSOs may still find the information helpful. Please remember that the GLDPM is not a binding schedule but a set of data that TSOs can, but do not have to obtain if they do not wish to. In the light of these clarifications we believe it not to be necessary to revise the methodologies in the light of your comment.	
4575_B	EDF	EDF agrees that market parties should obtain their most accurate forecasts in due time so to enable TSOs to efficiently operate the electricity system. As mentioned earlier in the response and discussed at ENTSO's public workshop on February 10th, market parties' forecasts (in particular at D-2 as mentioned in line 4575) could be considerably improved if TSOs published the following information: 1) Full-curve CGNs (including weather data) for yearly, monthly, and weekly time frames; 2) Inverse XB exchange capacities (both MTC and FB domain) for all short-term horizons (D-2, DA, ID) one day before these limits are or by D-3 at the latest; 3) Capacity calculation methodologies; 4) Listing publications in the framework of REMIT with actual anonymous outputs of capacity calculation (e.g. CICO or MTC).	TSOs have repeatedly come to the conclusion that in connection with the CGM and GLDPM methodologies no additional data can be released. Therefore we shall not modify the methodologies in the light of the comment. Please see our detailed explanation on this topic. Specifically with respect to this comment, we wish to note that there will be no pan-European Common Grid Model for the monthly and weekly timeframes. Some of the other data you request depend on the capacity calculation methodologies processes and timeline and are not in the context that the capacity calculation methodologies are subject to consultation and also have to be published pursuant to Regulation 2015/1222. However, they are out of scope for the CGM drafting team.	See note with filename "Transparency"

1991-1992

[illegible]

4453. B	FRANCA LINDON, SUEDEBANKEN, ENERTECH, BENTON	Why not use same data as is used in GLPH (see comment to lines 4534-4536)?	Please refer to the answer to comment 4534. A
4454. A	PIRELECTRIC	It should be enough to report according to REHAT. We should avoid double reporting of same things to ACER and to ENTSO-E and to the Member States.	Please refer to the answer to comment 4534. A
4454. B	FRANCA LINDON, SUEDEBANKEN, ENERTECH, BENTON	Why not use same data as is used in GLPH (see comment to lines 4534-4536)?	Please refer to the answer to comment 4534. A
4459. A	FRANCA LINDON, SUEDEBANKEN, ENERTECH, BENTON	The requirements of section 3.4 should be consistent with section 1.7, so that section 3.4 should not apply to interconnectors which are not covered by TSOs. Data from interconnectors that are covered by TSOs will be included in the Common Grid Model but inclusion in an individual Grid Model is not required. Obligations on all certified TSOs. We therefore suggest that the section should be read: 3.4 Data to be provided by interconnectors which are not operated by TSOs, certified according to Article 3 of Regulation (EC) No 714/2009	Reverse corresponding section title to read "3.4 Data to be provided by interconnectors which are not operated by TSOs" (although we may not use the exact formulation that you propose). We avoid at any time clarify the following: interconnectors operated by certified TSOs are out of scope of the GLPH and are not required to provide data under the GLPH where the responsibility for complying with the corresponding obligations has been assigned to another TSO pursuant to Article 1(3) of Regulation 2013/1222. Also note that all TSOs are free to designate tasks assigned to them by Regulation 2013/1222 in accordance with Article 81 of the Regulation.
4455. A	IFREC	With regard to the variable data that has to be provided (IFREC would like to remark in general that industrial energy consumers with a demand facility are not used and able to provide the detailed information directly and very frequently to the TSO. Especially information about the forecasted data and modifications of the reactive consumption are not available or do not represent any value because it is not possible to influence or follow the forecast. The same holds for non-dominant energy consumers with a small penetration module 5, Article 45 sub 2, article 46 sub 1 and article 47 have up a lot of information to be provided that will lead to an unnecessary administrative burden and huge cost to provide the requested real time data.	The SOG, provisions themselves are out of scope in the sense that we cannot modify these. However, in the early year context, we will revise the data requirements with respect to demand facilities so as to improve the clarity of the document and reduce the burden for data providers. Specifically, we shall distinguish between those demand facilities that need to be modelled in detail and those which can be modelled as aggregates. All demand facilities connected at 220 kV or above shall be modelled in detail. However, for demand facilities connected at less than 220 kV there is no simple criterion determining whether they need to be modelled in detail or not; they need to be modelled in detail if and only if they have a significant impact upon the 220 kV and above transmission system. We appreciate that, at present, only large (in terms of MW) demand facilities will be familiar with the sort of data provision requirements that are standard for generation units of even relatively small capacity. For the reason the GLPH shall provide for sufficient time for implementation of additional reporting requirements (if any). Please see the note referred to on the right. This will give data providers "timely" covered by the GLPH whose data the TSO requires time to make the necessary preparations. As for those demand facilities that are not "timely" and whose market participation is intermediated by an aggregator, the GLPH shall formulate obligations as comparisons for the aggregator. This shall include a clear set of unambiguous requirements are formulated with respect to such "timely" demand facilities. Note that real-time data are completely out of scope of the GLPH; the GLPH is not aiming for
4460. A	SEZ, P2 Analysis, Energy Markets Association, ELPELECTRIC	The Transmission System Operator Guidelines have been drafted (and will be approved) on the basis that structural data will be provided for transmission connected demand facilities. The proposed working here ("relevant demand facilities" as defined in section 1.7) shall also provide these data. It could be seen as an attempt to circumvent what is in the TSOO by extending the obligation to distribution connected demand facilities. Had the Commission, the Member States or the Parliament intended this to be the case then they would have drafted the TSOO accordingly.	Our aim in basing the GLPH on the SOG, to the extent possible was to keep things simple for everyone. It is in the light of the comments that we realise that it would be more appropriate to take the contents of the GLPH to the requirements of building the COH in a more bespoke manner. The SOG, and the GLPH have different objectives and as such it should not be surprising if the requirements formulated in both documents with respect to third parties differ. That is not an attempt to circumvent agreements made in other fora with respect to the contents of the SOG. For the sake of completeness we note that in the light of our explanations we see no need to modify the GLPH. However, the principles based on which we shall revise the GLPH (if outline referred to on the right) should go some way towards addressing your concerns. See answers given to comments at lines 4575-4579 where applicable.
4467. A	FRANCA LINDON, SUEDEBANKEN, ENERTECH, BENTON	4463 to 467. Some comments in to lines 4575-4579, when applicable.	Please see answer to comment 4635. A, 500
4463. A	SEZ	It should be made clear that an aggregator would only be provided the distribution connected demand facilities of a structural nature, as defined in 1.7, and not the real-time data. The aggregator would be responsible for the real-time data.	Please see answer to comment 4635. A
4463. B	SEZ	SEZ would like to see an aggregator as a structural unit for this to be accepted for structural considerations. It should be made clear that power will only be curtailed if paid for. Around this line to read: "maximum and minimum power paid to be curtailed", "and"	While we understand the concern underlying the comment and we therefore incorporate your comment as described below, we should not be seen to be making prejudicial statements on local (national) TSO arrangements. We have therefore revised the draft to read as follows: "In case of participation in demand side response, a schedule of its structural minimum and maximum power (demand reduction) to be provided in line with the applicable (national) arrangements; we trust that this will achieve what the comment was aiming at. However, please do not be surprised if that entire paragraph (which was included because of our intention to base the GLPH on the SOG, as much as possible) is removed as part of the revision."
4464. A	IFREC	With respect to data provided by demand facilities, ENTSO-E mentions for the variable data: "In case of participation in demand side response, a schedule of its structural minimum and maximum power to be curtailed". The last word, curtailed, should be replaced by reduced, as curtailment has a large range of implicit connotations and for IFREC, demand response participation must be voluntary and remunerated, which is not in line with what curtailment entails (e.g. non-voluntary and no remuneration).	Please see answer to comment 4603. B

18 of 103

4669_A	SSE, EURELECTRIC	If the collection of relevant demand quality standards is similar to consumer data, the obligation for energy providers to provide availability plans for advanced flexibility?	It appears necessary to clarify the role of the obligation for energy providers to provide availability plans for advanced flexibility. It is not clear from the text whether this obligation is intended to be a condition for the provision of advanced flexibility services or whether it is a separate obligation. The obligation should be clarified to avoid any ambiguity.	Please see answer to comment 4635_A.	
4671_A	EURELECTRIC, Energy Network	Same comments as to lines 4575-4577, when applicable.		See comments to lines 4575-4577, when applicable.	
4707_A	SSE, EURELECTRIC	The wording of the two comments was not completely identical. It should be made very clear that the obligation in the methodology with respect to Chapter 4 - data quality assurance - also applies to the TSOs. For example, in the context of the 4717, the TSOs should be able to sanction the TSOs in respect of insufficient data quality. In the current proposal there is no mention on what are the penalties involved, if any, in case of poor quality of the information provided by TSOs.	It should be made very clear that the obligation in the methodology with respect to Chapter 4 - data quality assurance - also applies to the TSOs. For example, in the context of the 4717, the TSOs should be able to sanction the TSOs in respect of insufficient data quality. In the current proposal there is no mention on what are the penalties involved, if any, in case of poor quality of the information provided by TSOs.	TSO's obligations are clearly set out in the law (e.g., Regulation 2015/1222 Article 19 (2)). Having said that, we do not disagree with the spirit of your comment which we find that the actual outcome of the methodology should be a more appropriate balance of responsibilities. We will clarify TSO's obligations in the text and we will include appropriate language for monitoring as far as TSOs are concerned (read the text in the context of the methodology). We will also clarify the obligations of the TSOs in the methodology (i.e., data quality assurance) and we will ensure that the obligations are set out in the methodology referred to in the right box.	See note with reference 'principles, for revision, of GLDPM' include proposals for quality monitoring as far as TSOs are concerned in the GLDPM
4713_A	SSE, EURELECTRIC	(NB: The wording of the two comments was not completely identical.) In accordance with Article 5(3) of the TSOs, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO. Amend the text to read: "... that they respect the TSO's implementation rules including specific requirements related to data quality. The TSO will consult stakeholders prior to submitting their implementation rules to the national regulatory authority for approval."	(NB: The wording of the two comments was not completely identical.) In accordance with Article 5(3) of the TSOs, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO. Amend the text to read: "... that they respect the TSO's implementation rules including specific requirements related to data quality. The TSO will consult stakeholders prior to submitting their implementation rules to the national regulatory authority for approval."	We do not think that SOG (2013/11/27) Article 5(3) is applicable to this article addressing the TSO's obligations. However, we do not disagree with the spirit of your comment. While the exact formulation should be used in the revised GLDPM will not be known for some time, we agree that the implementation rules should be approved by the NRA. For rules (on things such as the format etc) that are of purely local / national relevance, it does not make sense to suggest an alternative to the procedures already in place. Please see the outline referred to in the right but addresses these principles.	See note with reference 'principles, for revision, of GLDPM'
4715_A	ENF	Section 8 of the consultation document mentions that TSOs are responsible for the quality of data and (SOGs). In view of the comments in Sections 8.2 and 8.3 are more related with "consistency" of the data and COGS than with the "accuracy" of forecast and scheduled data (i.e. to what extent these forecasts are close to real time events). Contrary to what is proposed for Generation and Load Data (line 4715), notwithstanding the fact that SOG, COGS, and Generation and Load Data are subject to forecast errors by their nature, it would be relevant in our view to define key performance indicators related with the accuracy of TSOs and COGS. These indicators could then be periodically disclosed and compared, enabling all interested parties to improve their own approaches.	Section 8 of the consultation document mentions that TSOs are responsible for the quality of data and (SOGs). In view of the comments in Sections 8.2 and 8.3 are more related with "consistency" of the data and COGS than with the "accuracy" of forecast and scheduled data (i.e. to what extent these forecasts are close to real time events). Contrary to what is proposed for Generation and Load Data (line 4715), notwithstanding the fact that SOG, COGS, and Generation and Load Data are subject to forecast errors by their nature, it would be relevant in our view to define key performance indicators related with the accuracy of TSOs and COGS. These indicators could then be periodically disclosed and compared, enabling all interested parties to improve their own approaches.	Please refer to the answer to comment 3379_A.	
4717_A	EURELECTRIC	TSO should have the right to sanction insufficient data quality in an appropriate manner. It should be defined: TSOs should have the right to sanction insufficient data quality in an appropriate manner.	TSO should have the right to sanction insufficient data quality in an appropriate manner. It should be defined: TSOs should have the right to sanction insufficient data quality in an appropriate manner.	We agree with your proposal to delete the sentence because that sentence introduces unnecessary uncertainty and risk for data providers that is unlikely to be helpful.	Change already made in reader, no additional to-do
4717_B	SSE	As per the point 1 raised at the February 2016 workshop, details are required here of (1) what the 'sanctions' are and (2) how a party that has been sanctioned by the TSO can appeal that sanction to the NRA. It is agreed national justice that a TSO can appeal to an independent third party.	As per the point 1 raised at the February 2016 workshop, details are required here of (1) what the 'sanctions' are and (2) how a party that has been sanctioned by the TSO can appeal that sanction to the NRA. It is agreed national justice that a TSO can appeal to an independent third party.	We have removed the offending sentence. That should ensure that the comment is adequately taken into account.	Change already made in reader, no additional to-do
4717_C	EN, Avastar, Energy Networks Association	TSO can unilaterally punish another party in terms of data quality without that party having a right to appeal that TSO imposed sanction to the NRA. It is agreed national justice that a TSO can appeal to an independent third party.	TSO can unilaterally punish another party in terms of data quality without that party having a right to appeal that TSO imposed sanction to the NRA. It is agreed national justice that a TSO can appeal to an independent third party.	We have removed the offending sentence. That should ensure that the comment is adequately taken into account.	Change already made in reader, no additional to-do
4717_D	ENF	The possibility for TSOs to sanction stakeholders for "insufficient data quality" (mentioned in line 4717 of the GLDPM) seems to go far beyond the powers given to TSOs in the framework of the TSOs' regulatory framework and the CACM Regulation. Data quality obligations derive from the interconnected regulatory framework and all parties (i.e. TSOs, SOG, and other market participants) to make their best efforts to provide their most accurate and reliable possible data. The current version of the document does not clearly what sanctions or costs power TSOs will be given, however we do not believe obligations as sanctions related to the level of quality of the data provided can be in any way imposed by TSOs. The approach proposed in the draft Guideline SO (Article 70.6) seems to be more in line with the interpretation of the obligations deriving from Guideline CACM as regards data provision obligations in the framework of the TSOs.	The possibility for TSOs to sanction stakeholders for "insufficient data quality" (mentioned in line 4717 of the GLDPM) seems to go far beyond the powers given to TSOs in the framework of the TSOs' regulatory framework and the CACM Regulation. Data quality obligations derive from the interconnected regulatory framework and all parties (i.e. TSOs, SOG, and other market participants) to make their best efforts to provide their most accurate and reliable possible data. The current version of the document does not clearly what sanctions or costs power TSOs will be given, however we do not believe obligations as sanctions related to the level of quality of the data provided can be in any way imposed by TSOs. The approach proposed in the draft Guideline SO (Article 70.6) seems to be more in line with the interpretation of the obligations deriving from Guideline CACM as regards data provision obligations in the framework of the TSOs.	We have removed the offending sentence. That should ensure that the comment is adequately taken into account.	Change already made in reader, no additional to-do
4717_E	EURELECTRIC	TSOs should be allowed to set sanctions for insufficient data quality. There are already processes in sanctioning wrong data (REMIT). No additional legislation is needed. If parties are not following set rules, the process should be applied. No additional documents to be added to REMIT.	TSOs should be allowed to set sanctions for insufficient data quality. There are already processes in sanctioning wrong data (REMIT). No additional legislation is needed. If parties are not following set rules, the process should be applied. No additional documents to be added to REMIT.	We have removed the offending sentence. That should ensure that the comment is adequately taken into account.	Change already made in reader, no additional to-do

19-09-2016

4717.F	Stakeholders, European Commission	We understand that there is a need for the data and that data owners should deliver "the most reliable set of estimations practicable". However, we do not think that the TSOs should have the right to sanction insufficient data quality - what is insufficient data quality, when we are talking about "estimations"? In addition, there are already sanctions connected to providing wrong data - REMIT is the appropriate reference here, so data owners will provide correct data due to the existing legal obligations.	We have removed the offending sentence. That should ensure that this comment is adequately taken into account.	Change already made in master, no additional to do
4717.G	EDF	As a result of the TSOs' data quality rules, which will require data to be accurate, reliable and complete, we believe that the TSOs will be able to provide the data required for the GLPHM. However, we do not think that the TSOs should have the right to sanction insufficient data quality - what is insufficient data quality, when we are talking about "estimations"? In addition, there are already sanctions connected to providing wrong data - REMIT is the appropriate reference here, so data owners will provide correct data due to the existing legal obligations.	We have removed the offending sentence. That should ensure that this comment is adequately taken into account.	Change already made in master, no additional to do
4717.H	EDF	The possibility for TSOs to sanction stakeholders for "insufficient data quality" (mentioned in 4717 of the GLPHM) seems to go beyond the powers given to TSOs in the framework of the Third Energy Package and the CACM Regulation. Data quality obligations deriving from the above-mentioned regulatory framework and all parties (i.e. TSOs, SOGIs and other market participants) to make their best efforts to provide their most accurate and reliable possible estimates. The current version of the methodology does not clearly state what sanctions or extra powers TSOs will be given, however we do not believe obligations or sanctions related to the level of quality of the data provided can be in any way imposed by TSOs. EDF will of course use its best efforts to provide the most accurate data, but we consider that the assessment of the quality of these data should not fall within the competences of TSOs. We also wish to stress the fact that these data are by nature an estimation, so they cannot be used as a basis for a certain performance. The approach proposed in the draft Guideline SO (Article 70.6 of the 2016-02-23 version, not the 2015-11-27 version) (P1) - 6. If following the assessment referred to in paragraph 6, a TSO considers that the accuracy of the variables is insufficient to evaluate operational security, it shall determine the causes of the inaccuracy. If the causes depend on the TSO's procedures for determining the individual grid model, that TSO shall review those procedures to obtain more accurate results. If the causes depend on variables provided by other parties, that TSO together with those other parties shall endeavour to ensure that the variables concerned are accurate. It seems to me that the interpretation of the obligations deriving from Guideline CACM as regards data provision obligations in the framework of the GLPHM.	We have removed the offending sentence. That should ensure that this comment is adequately taken into account.	Change already made in master, no additional to do
4717.I	EDF	With the Third Energy Package, ENTSO-E has been granted extended powers, including drafting network codes. However, the methodology proposed would go one step beyond by giving TSOs the power to penalise grid users and TSOs. On page 47, the GLPHM reads: "TSO shall have the right to sanction insufficient data quality in an appropriate manner". (...) We believe only a regulator should be able to sanction grid users and TSOs for a lack of compliance with European network codes and/or an appropriate response to a TSO's request.	We have removed the offending sentence. That should ensure that this comment is adequately taken into account.	Change already made in master, no additional to do
4720.A	ELABELLEC	As for the TSOs themselves, as well noted in section 1.5 there is a simple criterion that they have to meet: their SOGIs have to pass the quality checks required before the models can be made available via the OPHC. A requirement of reporting about these quality checks, with appropriate justifications and explanations, shall be envisaged in the next version of the GLPHM/ENSO/CDM. Moreover, insufficient data quality from the TSOs side shall be assessed and properly considered in the process. The national legal frameworks already foresee the potential infringements and actions related to the quality of the data provided by the TSOs, in the same manner as "insufficient data quality" from the side of the stakeholders.	We agree with the spirit of your suggestion which aims at a more balanced assignment of responsibilities. We will include proposals for quality monitoring (most likely in the CDM) rather than in the GLPHM in order to take the comment into account.	
4725.A	EDF	The general implementation timeframe presented during the ENTSO-E workshop of February 18th should be included for the sake of transparency in section 3 of the draft methodology. Furthermore, it shall require some amendments to the methodology before their approval, market parties should be informed to be able to adapt and to ensure the implementation of the requested evolutions.	We checked against the workshop notes - there was only one note on the topic of the timeframe for implementation which provided a very general overview. Since the timeframe will be revised we shall not be taking into account that comment in the methodology.	Some interested parties updated via the ENTSO-E website etc.
4729.A	SEI, ELABELLEC	Given the statement in 4742 (over TSOs will convene implementation once the methodology is submitted for approval) and the statement in 4743 (over TSOs will be able to adapt and to ensure the implementation of the requested evolutions), it is not clear how the TSOs will be able to adapt and to ensure the implementation of the requested evolutions.	We checked against the workshop notes - there was only one note on the topic of the timeframe for implementation which provided a very general overview. Since the timeframe will be revised we shall not be taking into account that comment in the methodology.	Each individual TSO to submit its stakeholders (in the context of the GLPHM) that they are aware of any changes to the methodology and, if and when applicable, any changes to the requirements envisaged by the TSOs. TSOs shall not assume that the methodology will be approved without amendments and they shall make it clear to stakeholders (in particular data providers) that the methodology and any implementation guidance is provisional and subject to confirmation or revision (as the case may be). It should not be necessary for stakeholders to commit resources unless and until a definitive version of the GLPHM has been approved.
4749.A	SEI, ELABELLEC	As per the comments under 4713, and in accordance with Article 8(5) of the TSOs, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO.	We checked against the workshop notes - there was only one note on the topic of the timeframe for implementation which provided a very general overview. Since the timeframe will be revised we shall not be taking into account that comment in the methodology.	Each individual TSO to submit its stakeholders (in the context of the GLPHM) that they are aware of any changes to the methodology and, if and when applicable, any changes to the requirements envisaged by the TSOs. TSOs shall not assume that the methodology will be approved without amendments and they shall make it clear to stakeholders (in particular data providers) that the methodology and any implementation guidance is provisional and subject to confirmation or revision (as the case may be). It should not be necessary for stakeholders to commit resources unless and until a definitive version of the GLPHM has been approved.
4753.A	SEI, ELABELLEC	(NB: For simplicity, the comments referred to are restated below.) In accordance with Article 8(5) of the TSOs, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO. Amended this line to read: "...but they respect the TSO's implementation rules including specific requirements related to data quality. The TSO will consult stakeholders prior to submitting their methodology for approval." (NB: The wording of the two comments referred to is restated below.) (NB: The TSO will consult stakeholders prior to submitting their methodology for approval.) (NB: The TSO will consult stakeholders prior to submitting their methodology for approval.)	We checked against the workshop notes - there was only one note on the topic of the timeframe for implementation which provided a very general overview. Since the timeframe will be revised we shall not be taking into account that comment in the methodology.	Each individual TSO to submit its stakeholders (in the context of the GLPHM) that they are aware of any changes to the methodology and, if and when applicable, any changes to the requirements envisaged by the TSOs. TSOs shall not assume that the methodology will be approved without amendments and they shall make it clear to stakeholders (in particular data providers) that the methodology and any implementation guidance is provisional and subject to confirmation or revision (as the case may be). It should not be necessary for stakeholders to commit resources unless and until a definitive version of the GLPHM has been approved.
4765.A	EDF	The methodology proposed would go one step beyond by giving TSOs the power to penalise grid users and TSOs. On page 47, the GLPHM reads: "TSO shall have the right to sanction insufficient data quality in an appropriate manner". (...) We believe only a regulator should be able to sanction grid users and TSOs for a lack of compliance with European network codes and/or an appropriate response to a TSO's request.	We checked against the workshop notes - there was only one note on the topic of the timeframe for implementation which provided a very general overview. Since the timeframe will be revised we shall not be taking into account that comment in the methodology.	Each individual TSO to submit its stakeholders (in the context of the GLPHM) that they are aware of any changes to the methodology and, if and when applicable, any changes to the requirements envisaged by the TSOs. TSOs shall not assume that the methodology will be approved without amendments and they shall make it clear to stakeholders (in particular data providers) that the methodology and any implementation guidance is provisional and subject to confirmation or revision (as the case may be). It should not be necessary for stakeholders to commit resources unless and until a definitive version of the GLPHM has been approved.

12/05/2017

9785_B	EDF	General comment relating to the GDS 2. The role of TSOs and Significant Grid Users. The draft methodologies could imply a potential extension of the obligations imposed on generation and consumption units identified as SGUs in terms of data provision to TSOs. Inability to share data with the TSOs could be a barrier to the provision of their data to the TSOs. Since the TSOs are responsible for the provision of data to the TSOs, it is not clear how the TSOs can be held responsible for the inability to provide data to the TSOs. Since the TSOs are responsible for the provision of data to the TSOs, it is not clear how the TSOs can be held responsible for the inability to provide data to the TSOs. Since the TSOs are responsible for the provision of data to the TSOs, it is not clear how the TSOs can be held responsible for the inability to provide data to the TSOs.	Please see answer to comment 4021_A	
9816_A	SSE, EURELECTRIC	The inclusion of the two annexes information / illustrative purposes is very helpful to the reader of the methodology	Thank you for the encouraging remark. We shall retain the annexes for informative purposes. Although the provisions on participation in the GDS process shall become substantive more formal. We shall ensure for the sake of completeness that your comment does not require any changes to the document.	
9842_13	MOBILE JUNCTION CONTRACTOR LTD.	The name of Mobile Junction Contractor Ltd should be corrected in synchronous area GB (sub-line 15).	Thank you for the suggestion which we shall implement because it improves the quality of the document.	Changes to make already made
9842_19	MOBILE JUNCTION CONTRACTOR LTD.	We suggest: The Mobile Junction Contractor (owned by a certified TSO) is included in synchronous area GB (sub-line 15), but should also be included in synchronous area IE/NI (sub-line 19).	Thank you for the suggestion which we shall implement because it improves the quality of the document.	Changes to make already made
9999_A	ENLIGHT ENERGY ASSOCIATION, EURELECTRIC	We suggest: 19- IE / NI: IE/NI - EirGrid plc, System Operator for Northern Ireland Ltd, Mobile Junction Contractor Ltd. Yes - No (Commentator(s) originally did not assign any particular line number; the number was assigned by the drafting team.) As the CDMH suggests new entry fields for the DSO (and other actors) within the electricity industry, we make a general recommendation on the overall societal value calculation, where these costs are compared to the potential value creation at TSO level.	Please refer to the answer to comment 1507_A	
9999_B	ENLIGHT ENERGY ASSOCIATION	(Commentator(s) originally did not assign any particular line number; the number was assigned by the drafting team.) As the CDMH suggests new entry fields for the DSO (and other actors) within the electricity industry, we make a general recommendation on the overall societal value calculation, where these costs are compared to the potential value creation at TSO level.	Please refer to the answer to comment 1507_A	
9999_C	ENLIGHT ENERGY	(Commentator(s) originally did not assign any particular line number; the number was assigned by the drafting team.) Each national TSO shall be given the power to implement the rules, in the most cost effective way, at a local national level.	We agree that implementation shall be according to national rules which will in many cases entail the consultation of stakeholders and at least a reference role for the NRA. For rules (or rules) such as the formulae etc) that are of purely local / national relevance, it does not seem as appropriate to suggest an alternative to the procedures already in place. Since your comment aims at a more efficient implementation of the methodologies we shall incorporate it into the methodologies by using the revised version on the outline referred to on the right. That outline concentrates on the GDSM, but the principles formulated with respect to implementation could also be incorporated into the GDSM.	See note note with Name: "principles for revision of GDSM"

27/04/2017

9999_D	ENEL	(Commentator(s) originally did not assign any particular line number, line number was assigned by the drafting team.) First of all in my opinion I think that two documents CGM and GLDPM are well prepared and describe almost everything in the process, but I have a remark that is related with the quality of the CGM(CGMs). Please see below. As is mentioned in CGM document, CGMs are the principal building blocks of CGM, so their quality defines then the quality of the CGM, quality that is very important because of the purpose that CGMs are used, that is: 1. Capacity calculation 2. Operational security analysis 3. Outage planning So the the importance of the CGM(their quality) is well known. In CGM document it is stated that "all TSOs create CGMs that are as realistic and accurate as possible, reflecting the best possible forecast of transmission system conditions for each scenario specified by the TSO(s) at the time when the individual grid model is created" But I have observed in some TSOs (CGM/most DACE) that their same value are unrealistic. For example the voltage in some nodes does not represent the real situation of that network in that time. Or, if there are interconnectors, but the voltage are much greater or lower compared to their real situation (e.g. forecasted voltage 20kV, real voltage 120-130kV). So, how could we expect reliable results then for Security Analysis, Capacity Calculation and Outage Planning? In this case two are the possibilities that lead to those unreal values. First one is related with the network modelling, so which equipment is the model as it is modelled in the correct way (e.g. factor, tap changer or TR, etc.) and second one is related with total load of the system(import+export+generation). So if we suppose that network is modelled in the correct way (maybe each TSO can check every TSO model if they are modelled correctly) then we needed to compare at least every day the forecasted generation with the real one for each country (taking into account the forecasted voltage made with the real one looks very difficult or maybe impossible) since as a big factor that influences on voltage level and then in the flow over lines the same that is done with the sum of total import/export in QAS portal) and make aware each TSO in QAS portal that both you have big discrepancies, please try to solve this issue, so they could make a better forecast in the future.	Please refer to the answer to comment 4702_A
9999_E	Enlight Energy Association EURELECTRIC	(Commentator(s) originally did not assign any particular line number, line number was assigned by the drafting team.) First of all we fully recognise the purpose of adding to increase the international market capacity between the European countries, without lowering the security of supply level. (Commentator(s) originally did not assign any particular line number, line number was assigned by the drafting team.) In regard of particular we suggest that it is explicitly written and highlighted in the documents, that each national TSO are given the power to implement the rules, in the most cost effective way, at a local national level. This is suggested as we sense that the cooperation between the national TSO and the DSO's are very different, from country to country. As described in GL SO (2015-11-27) article 4: "When applying the Regulation, Member States, regulatory authorities and system operators shall: ... (d) apply the principle of optimisation between the highest overall efficiency and lowest total costs for all parties involved; ... (g) consult with relevant DSOs and take account of potential impacts on their system..." This is a sound principle and should be emphasised in the CGM and GLDPM.	Thank you for the encouraging comment. For the sake of completeness we note that it does not suggest changes to the methodologies.
9999_F	Enlight Energy Association EURELECTRIC	(Commentator(s) originally did not assign any particular line number, line number was assigned by the drafting team.) On the one side we strongly recommend that ACER and the national regulatory authorities are made aware of these new rules, so that they can prepare the economic regulation of the DSO's which will have to be increased corresponding to any associated costs for the DSOs, as it is common when DSOs are imposed by new rules. As described in GL SO (2015-11-27) article 9 - Recovery of costs: 1. The costs borne by system operators subject to network tariff regulation and stemming from the obligations laid down in this Regulation shall be allocated by the relevant regulatory authorities. Costs assessed as reasonable, efficient and proportionate may also be recovered through network tariffs or other appropriate mechanisms.	Please refer to the answer to comment 9999_C
9999_G	Enlight Energy Association EURELECTRIC	(Commentator(s) originally did not assign any particular line number, line number was assigned by the drafting team.) On the one side we strongly recommend that ACER and the national regulatory authorities are made aware of these new rules, so that they can prepare the economic regulation of the DSO's which will have to be increased corresponding to any associated costs for the DSOs, as it is common when DSOs are imposed by new rules. As described in GL SO (2015-11-27) article 9 - Recovery of costs: 1. The costs borne by system operators subject to network tariff regulation and stemming from the obligations laid down in this Regulation shall be allocated by the relevant regulatory authorities. Costs assessed as reasonable, efficient and proportionate may also be recovered through network tariffs or other appropriate mechanisms.	We are happy to confirm that we will follow your suggestion by submitting the methodologies to ACER and ACER for approval. We note for the sake of completeness that your comment does not require any modification of the documents.
9999_H	Enlight Energy Association EURELECTRIC	(Commentator(s) originally did not assign any particular line number, line number was assigned by the drafting team.) The CGM refers on numerous places to requirements in GL SO (2015-11-27). This guideline is still under revision by a border committee. Hence the content of the CGM in consultation is updated. The consultation of CGM is therefore preliminary and should be prepared or repeated when the final working of GL SO is known. The following comments are given on the basis of GL SO version (2015-11-27), and we welcome and final consultation when GL SO is final.	We can confirm that the methodologies will be revised in the light of the future Commission Regulation (EU) ... of 2016 establishing a guideline on demand response regulation (DRC). In the case of the CGM and the GLDPM and the future Commission Regulation (EU) ... of 2016 establishing a guideline on transmission system operation (TSO) (in the case of the GLDPM) and that in such case a public consultation will be organised in line with the legal requirements set out in these two pieces of legislation. We note for the sake of completeness that your comment does not require any modification of the documents.

The table with detailed replies contains references to two notes ("transparency" and "principles_for_revision_of_GLDPM"). These notes have been superseded. However, for the sake of completeness we nevertheless append them below.

As has become clear from both the discussion at the stakeholder workshop and the comments submitted by stakeholders as part of the public consultation, the publication of additional data by TSOs is of considerable importance to a number of stakeholders.

TSOs are not in principle opposed to making additional non-confidential data available. However, any such additional data releases shall not be covered in the CGM and GLDP methodologies. There is one practical and two fundamental reasons for this.

The practical reason is that time until the deadline for submission of the methodologies is far too short in order for us to draft an additional substantive section on additional data to be released by TSOs. Stakeholders would presumably – and quite reasonably – want to discuss this topic (incl. implementation) before things are put on paper and thus "frozen" for the foreseeable future and there simply is not enough time to complete such a process before the submission deadline.

However, there are also two fundamental reasons why such additional data releases by TSOs are not to be covered in the methodologies.

- Firstly, the question of the transparency of the common grid model and network data is outside the scope of the CGM and GLDP methodologies established pursuant to Regulation 2015/1222. The methodologies cannot go beyond their scope as established pursuant to the Regulation.
- Secondly, the topic of the transparency of fundamental market data has in the past always been addressed in the context of the Transparency Regulation [*COMMISSION REGULATION (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council.*] As the transparency of the common grid model and network data is an important policy question, this requires a more in-depth discussion among TSOs, regulators, the European Commission, stakeholders and Member States. For this reason the matter should be tackled as part of future revisions/updates of the Transparency Regulation.

Finally, for the sake of completeness we also wish to add that some of the data or models requested are simply not available; for example, there will be no pan-European Common Grid Model for the monthly and weekly timeframes. Other information requested will depend on the capacity calculation methodologies processes and timeline and we note in this context that the capacity calculation methodologies are subject to consultation and also have to be published pursuant to Regulation 2015/1222.

We understand that this is not the response that stakeholders would have wanted to get, but we trust that it will be possible to accommodate the request in future.

The present note describes, in a summary manner, how the TSOs are planning to revise the GLDPM. By providing the present note we aim to efficiently explain how we will incorporate a number of comments made with respect to the GLDPM.

TSOs shall revise the GLDPM in the following way:

(i) the GLDPM shall specify the data pursuant to Regulation 2015/1222 Article 16 as a definitive maximum list of data that all TSOs may but are not required to obtain from generation units and loads

- make it clear that real-time data are generally out of scope of the Methodologies and are not required to be provided under the GLDPM
- make it clear that based upon the GLDPM only the data explicitly listed therein may be requested by TSOs

(ii) each TSO shall determine which data it requires in order to build its IGM and, more generally, meet its legal obligations under Regulation 2015/1222; the data considered "required" shall be the minimum set of data that allows the TSO to meet its legal obligations

- in the harmonisation requirement in Regulation 2015/1222 Article 19 (4) the phrase "the way in which individual grid models are built" shall be understood to refer to the modelling principles and not to the degree of detail and granularity to be modelled (otherwise all TSOs would be required to include details in their model that do not bring additional benefits in the sense that they are not needed in order to meet the legal requirements, but impose potentially enormous costs on both TSOs and data providers)

(iii) each TSO shall check its requirements against those data which are already available to it because

- it already obtains these data pursuant to national regulation, market rules, or on the basis of another type of legally binding authorisation (which the GLDPM shall not affect);
- it does not already obtain these data but could obtain them from EMFIP or under REMIT

(iv) each TSO shall request from generation units and loads only those required data under the GLDPM that are not yet available to it; the GLDPM shall not lead to double-reporting unless this were explicitly required by other items of legislation. For the avoidance of doubt, those data to be provided to the TSO under the GLDPM shall in principle be provided directly to the TSO.

(v) each TSO shall document the data it requests from generation units and loads under the GLDPM and make this information available to ENTSO-E as required by Regulation 2015/1222 Article 16 (6)

(vi) where the data required by the TSO or the data already available to the TSO change and, as a result, the TSO no longer obtains the data it requires, the TSO shall be allowed to modify the data it requests from generation units and loads

(vii) each TSO shall regularly and at least once per year update the list pursuant to Regulation 2015/1222 Article 16 (6); the list shall state as of which date it was valid (TSOs are not strictly speaking required to do this, but it seems a good idea to do this voluntarily)

(viii) each TSO shall set implementing rules in order to describe the practicalities of data delivery such as file formats and interfaces to be used in conformity with the procedures applicable under national law (e.g., requiring stakeholder consultation and/or NRA approval etc); in setting the implementing rules each TSO shall make use of existing infrastructure and data delivery processes to the extent possible and it shall allow sufficient time for implementation; where appropriate TSOs shall also provide clarification on definitions etc [Note that these principles related to implementation should also apply for the CGMM]

(ix) disputes related to the implementation of the GLDPM – e.g., with respect to which data are already available or which data the TSOs may request – and monitoring of the data provision process implemented pursuant to the GLDPM – e.g. data quality – shall be resolved by NRAs who shall enforce the implementation of the methodologies; there shall not be an explicit provision for penalties

(x) the GLDPM shall specify default deadlines for data provision

(xi) when publishing deadlines for data provision pursuant to Regulation 2015/1222 Article 16 (6) (c), each TSO may deviate from the default deadlines in a way that is less constraining for data providers than the default deadline

(xii) if the TSO wishes to revise deadlines in a way that is more constraining for data providers it shall do so following the national procedures applicable (especially in so far as stakeholder consultation and a possible requirement for NRA approval is concerned); however, it shall not set a deadline that is more constraining for stakeholders than the default deadline

(xiii) delegation of tasks related to data provision shall be possible in principle and shall be governed by the principles set out in Regulation 2015/1222 Article 81

Three of the respondents chose to submit their comments in the form of a letter (rather than use the TSOs' template). For the sake of completeness, these letters are appended below.

IFIEC answer to the ENTSO-e consultation on the Common Grid Model Methodology and the Generation and Load Data Provision Methodology

IFIEC welcomes the consultation by ENTSO-e on the Common Grid Model Methodology and the Generation and Load Data Provision Methodology, required as steps in the implementation of the Capacity Allocation and Congestion Management (CACM) Network Code.

IFIEC is not directly implicated in the Common Grid Model (CGM) and the computer models grid operators use to simulate behavior on their networks and make decisions. Nevertheless, the decisions taken by the TSOs based on these models and the overlying CGM influence the flows of power across Europe and thus the price formation, impacting all consumers of electricity in Europe and especially the large consumers, as they have often contracts that are directly linked to wholesale prices on the power exchanges.

IFIEC welcomes the integration of power networks in Europe as an important step towards an integrated European energy market, and as such also welcomes the implementation of a common grid model as networks become more interconnected, as it should allow TSOs to take integrated decisions to maintain the reliability of the grid at the least cost for the system and the lowest negative impact for customers and stakeholders.

An important element for IFIEC, also highlighted by ENTSO-e and guaranteed by the CACM Guideline, is the confidentiality of data under the CGMM and the GLDPM. Nevertheless, IFIEC wonders why the data on network elements from the TSOs should also be kept confidential, as this data is needed by many parties to be able to model their own views on the European grid. IFIEC believes that much (if not all) of this data related to the TSO grids already needs to be published under transparency rules, and in any case sees no reason why all this data should be kept confidential, as it does not involve actors subject to competition for which confidentiality is important from a competition perspective.

With respect to the approach of ENTSO-e to pursue one single CGMM and GLDPM instead of respectively three and two because of requirements in other Guidelines, IFIEC can only welcome such approach as it would not be efficient to have several parallel methodologies with probably only minor differences.

IFIEC would like to mention that the System Operation Guideline (SOG) is not definitive yet. It is important to notice in this regard that the articles on data exchange are subject to article 40.5. In the last version of the SOG, TSOs have been given more flexibility in deciding whether it is necessary to obtain all the information in the list. This flexibility was not in the text before. The GLDPM should be in line with the SOG and leave room for this flexibility.

With respect to the CGMM, as it is a merge of different individual grid models (IGMs), already currently being applied by TSOs for their control areas, the additional work load should in principle be limited. Nevertheless, as IGMs also look at underlying grids of the transmission grid, including closed distribution systems (CDSs), the observability area of the TSOs, the additional requirements for these grids should be kept at a reasonable level. The SOG for example requires a clear view on all relevant network elements

in those grids; for IFIEC, this should be kept at a reasonable level, as CDSs are often very much integrated and complex structures with network elements and demand and generation facilities from different actors, where the main impact and importance towards the overlying grids is the net position of CDSs at grid connection and not the behavior of all individual elements, which will moreover be difficult to model and integrate in IGMs. An approach with a network reduction for these CDSs seems the most logical and efficient from the IFIEC point of view, as would also be done for large parts of DSO grids and the decentralized production and load in those grids.

With respect to the IGM definition, that will eventually lead to the CGM, it is again important for IFIEC to state that an equipment model with structural data (with network reduction applied as described above), is an important first step. With respect to the operating assumptions with variable data and the associated information, the third pillar of the IGM definition, IFIEC would again like to ask TSOs and ENTSO-e to take a pragmatic approach, in order not to create additional burdens with respect to data transfer in ever-shorter timeframes without necessarily added value. The level of detail of data on all network components, including demand facilities, should be defined on the actual needs for the IGMs, in order to avoid unnecessary costs. Moreover, in longer timeframes, such as for example (multiple) year(s) ahead and month ahead but in some cases also week ahead or even shorter timeframes, such information will not be available in sufficient detail to all actors¹. With respect to baselining, the CGMM leaves the level of detail largely at the discretion of the individual TSOs; IFIEC proposes to follow a pragmatic approach, in line with current practices that in many cases are already sufficiently developed to fulfill the needs for the IGMs and CGM.

IFIEC is a proponent of harmonization, also of IGMs, to the extent that the additional benefits are in line with the additional costs. Harmonization should not lead to excessive costs just for the sake of harmonization if no additional value to IGMs and the CGM and the further integration of European power markets can be proven.

With respect to the GLDPM, covering the transfer of data on load and generation towards the TSOs, IFIEC would again propose a pragmatic approach, as this methodology covers not only power generating modules (types B, C, D), but also all transmission connected demand facilities, closed distribution systems as well as all relevant demand facilities under the SOG, which might also include all demand facilities delivering demand side response, up to the smallest units. The goal of the GLDPM (and the SOG and in general all network codes and guidelines) should be to provide the framework needed to allow for the integration of the European power markets, but should not create additional entry or operational barriers and obstacles (even for existing generation and demand facilities as well as CDSs), which would hamper the above goal and the triad of goals of the European Commission. The approach presented by ENTSO-e, with an implementation of the GLDPM on a local level by the local TSOs, where they shall make of existing processes and interfaces as much as possible is an important step in the good direction. Moreover, as also underlined by ENTSO-e, the GLDPM provides a maximum list of data that TSOs may request. IFIEC thus also encourages TSOs to take a pragmatic and efficient approach and only request the data that is actually needed and used, in order to minimize the impact and costs for all actors, and this while also applying those timelines and deadlines that are needed to fulfill the obligations towards the CGM and not more stringent and costly alternatives. IFIEC also reiterates its

¹ For example, forecasted demand reduction from demand units will not be known in longer timeframes, but will in most cases depend on conditions in the day ahead, intraday or (near) real time timeframes.

position on the model reduction for CDSs in the observability area of the TSOs, again to take a pragmatic approach.

With respect to data provided by demand facilities, ENTSO-e mentions for the variable data: *"in case of participation in demand side response, a schedule of its structural minimum and maximum power to be curtailed"*. The last word, curtailed, should be replaced by reduced, as curtailment has a large range of implicit connotations and for IFIEC, demand response participation must be voluntary and remunerated, which is not in line with what curtailment entails (e.g. non-voluntary and no-remunerated in most cases).

With regard to the variable data that has to be provided IFIEC would like to remark in general that Industrial energy consumers with a demand facility are not used and able to provide this detailed information directly and very frequently to the TSO. Especially information about the forecasted data and modifications of the reactive consumption are not available or do not represent any value because it is not possible to influence or follow the forecast. The same holds for non-domestic energy consumers with a small generation module B. Article 45 sub 2, article 46 sub 1 and article 47 sums up a list of information to be provided that will lead to an unnecessary administrative burden and huge cost to provide the requested real time data.

A last comment from IFIEC is on the data quality rules. Who will approve these rules and which sanctions will be applied? More clarity should be given on the definition and approval of these rules, the determination of (non-)compliance and the appeal procedures, as well as which actors would take up any of these roles, as it cannot be the goal to have a system where judge, jury and executioner are all the same entity, without any appeal with clear appeal procedures.

ENTSO-E consultation: TSOs' draft proposal of a Common Grid Model Methodology and a Generation and Load Data Provision Methodology

EDF Response

4th March 2016

GENERAL COMMENTS

EDF welcomes this ENTSO-E consultation on the TSOs common draft proposal of a Common Grid Model Methodology (CGMM) and a Generation and Load Data Provision Methodology (GLDPM) which gives stakeholders the opportunity to express their views on these topics.

The involvement of stakeholders in the implementation process of the CACM Regulation is of paramount importance to ensure the transparency and accountability of the proposals made by TSOs. Therefore, stakeholders should play an active role in the process for the elaboration of the methodologies to be established according to CACM Regulation as well as in their regional or national implementation. Moreover, TSO's proposals of terms and conditions and methodologies deriving from Guidelines and Network Codes are often liable to have significant impacts on grid users and market participants, so that the proposed solutions should be backed by impact assessments and cost-benefit analyses, where needed.

As regards CGMM and GLDPM, EDF wishes to highlight few general principles which TSOs should consider in order to strike the right balance between the accuracy of these methodologies, the obligations imposed on all the involved parties, and the benefits brought to the electricity system.

1. **Transparency on the Common Grid Model.** EDF believes that the publication of non-confidential sections of Common Grid Models should be guaranteed by TSOs. In particular, CGMs should be published in their full extent for all timeframes before D-2, when they reflect the best forecast made by system operators without any commercially sensitive information. The availability of this data will contribute to improve the accuracy of the forecasts provided by Significant Grid Users (SGUs), who can better anticipate the level of market prices in each bidding zone. As regards timeframes closer to real time (D-2, D-1 and ID), publications could be limited to the best available forecast of cross-border capacity (i.e. Flow-Based domain and NTCs) in order to enable market parties to better anticipate short term evolutions of market prices without having to disclose any confidential or sensitive information. Thus, a good level of transparency on the CGMs can have positive effects on the accuracy of the grid models themselves and would be consistent with the obligations imposed on TSOs by the Third Energy Package to provide estimates and information on the available transfer capacity of their networks and on the availability and use of generation and load assets (Article 15 of Regulation 714/2009 EC).

2. **The role of TSOs and Significant Grid Users.** The draft methodologies could imply a potential extension of the obligations imposed on generation and consumption units identified as SGUs in terms of data provision to TSOs. Notably, the identification of the specific data to be provided and the deadlines for the provision of these data will be left to local implementation with the possibility for TSOs to impose additional operational costs on market participants. Since some of the required estimates can be already elaborated by TSOs, EDF believes that the decision on the sharing of data provision obligations between system operators and SGUs should be taken by National Regulatory Authorities (NRAs) according to the principle of economic efficiency as clearly mentioned in the draft Guideline on System Operation (GL SO), i.e. *"apply the principle of optimisation between the highest overall efficiency and lowest total costs for all parties involved"* (Article 4.2(c)). Therefore, in defining the CGMM and the GLDPM, TSOs should not take the responsibility to unilaterally decide on the scope of SGUs' obligations and should, on the contrary, back their proposals with factual elements (e.g. cost-benefit analyses and timely consultation of stakeholders) which will be assessed by NRAs.
3. **Data quality obligations.** EDF wishes to draw attention on two important issues related to data quality obligations:
 - a. The possibility for TSOs to sanction stakeholders for "insufficient data quality" (mentioned in line 4717 of the GLDPM) seems to go far beyond the powers given to TSOs in the framework of the Third Energy Package and the CACM Regulation. Data quality obligations deriving from the abovementioned regulatory framework bind all parties (i.e. TSOs, SGUs and other market participants) to make their best efforts to provide their most accurate and reliable possible estimates. The current version of the methodology does not clarify what sanctions or extra powers TSOs will be given, however we do not believe obligations or sanctions related to the level of quality of the data provided can be in any way imposed by TSOs. EDF will of course use its best efforts to provide the most accurate data, but we consider that the assessment of the quality of these data should not fall within the competences of TSOs. We also wish to stress the fact that these data are by nature an estimation, so they cannot bind data providers to a certain performance. The approach proposed in the draft Guideline SO (Article 70.6)¹ seems to be more in line with this interpretation of the obligations deriving from Guideline CACM as regards data provision obligations in the framework of the GLDPM.
 - b. TSOs should elaborate and make public some key performance indicators to evaluate the accuracy of IGMs and CGMs. This further transparency effort would be useful in order to allow all interested parties to improve their own estimates and to contribute to the improvement of the methodologies and the scenarios used by TSOs with a benefit in terms of efficient operations of the electricity system.

¹ « 6. If following the assessment referred to in paragraph 6, a TSO considers that the accuracy of the variables is insufficient to evaluate operational security, it shall determine the causes of the inaccuracy. If the causes depend on the TSO's processes for determining the individual grid models, that TSO shall review those processes to obtain more accurate results. If the causes depend on variables provided by other parties, that TSO together with those other parties shall endeavour to ensure that the variables concerned are accurate".

4. **The scope of CGMs.** Since the current versions of the GLPM and CGMM mention, only for information purposes, the requirements of the FCA Guideline (not yet entered into force) and of the draft SO Guideline (still under discussion in Comitology), the scope of data provision obligations deriving from CACM Regulation's requirements should be clearly brought out in the two documents. Therefore, the chapters and provisions of the methodology which are binding at this stage in accordance with CACM Regulation should be more easily identifiable compared to the current draft (e.g. using specific colors or separate paragraphs). This evolution would also facilitate the review process of the methodologies, once GL FCA and GL SO will be adopted and entered into force. EDF finally agrees on the need to amend and re-submit to public consultation and NRAs approval the two methodologies, once GL FCA and GL SO enter into force.

SPECIFIC COMMENTS

See the attached Excel file.

ooOoo



DSO associations' response to ENTSO-E public consultation on the Common Grid Model Methodology and the Generation and Load Data Provision Methodology

March 2016

Contacts

CEDEC

Marc Malbrancke, Coordinator CEDEC WG Network Code (marc.malbrancke@cedec.com)

EDSO

Florian Chapalain, Policy Advisor (florian.chapalain@edsoforsmartgrids.eu)

EURELECTRIC

Carolina Vereda, Policy Advisor – DSO Unit (cvereda@eurelectric.org)

Geode

Johannes Vollmer, Policy Officer (jvollmer@geode-eu.org)

General comment

DSOs fully recognise the usefulness of seeking to increase the international market-capacity between European countries, without lowering security of supply. The Common Grid Model Methodology (CGMM) and the Generation and Load Data Provision Methodology (CGLDPM) are two essential elements of the Capacity Allocation and Congestion Management (CACM) network code: a bad implementation would limit cross-border electricity trade and could endanger the power system stability.

A public consultation on the proper implementation of the requirements set in the section 2 of the CACM is thus very welcome. However, Distribution System Operators (DSOs) are surprised by the extensive scope of the foreseen methodology, and concerned by the licence TSOs intend to grant themselves for collecting data from grid users and other system operators. In several instance, these documents seem to go beyond the legal duties given to TSOs. The associations of DSOs' concerns are listed hereafter.

Distribution networks are also managed by *system* operators

A majority of the installed capacity of renewable energy resources (RES) is connected to distribution networks, and many DSOs have been investing continuously in automation and control equipment for the last ten years. The transition from traditional grids to smart grids is underway, but already today DSOs are *system* operators who have much more means for active system management than in the past.

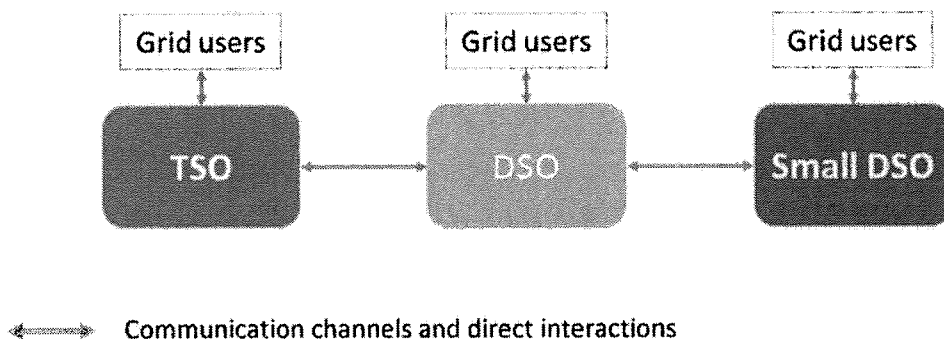
These system operators need data from grid users to operate their networks safely and efficiently manage RES. As distributed resources have greater effect on distribution than on transmission systems, DSOs need all necessary data from those generators. To avoid duplication of communication channels and unnecessary reporting burdens on generators, available data should be transferred between (distribution and transmission) system operators. Moreover, the data aggregation task of the DSO is important from a "one-system perspective".

In the CGMM methodology, two approaches for modeling the power system are described, the "network reduction" and the "extended view". The former implying to build a simplified model of the power system, the latter being a real in-depth simulation of power flows.

The network reduction approach appears to be the lightest in terms of IT processing power, and the easiest to implement. For decades, R&D-efforts were made to find efficient ways to reduce data for grid analysis without losing accuracy and make load flow analysis possible. To reduce complexity, Thévenin equivalents of neighboring and underlying systems were (and are) used. Significant DSOs could support this approach by delivering aggregated data on DSO-connected users to TSOs. DSOs would ensure that the aggregated values (e.g. load, generation by type) are correct and check the consistency of all delivered data. This model of interaction is favored by DSOs, who in any case need to collect data for their own system operations.

Member States may deviate from the methods if it involves high total costs to fully comply with the methods described in the document, as long as the overall intention can be met.

Simplified view of interactions and data flows between system operators



TSOs should not be allowed to expand unilaterally the network codes' scope

With the Third Energy Package, ENTSO-E has been granted extended powers, including drafting network codes. However, the methodology proposed would go one step beyond by giving TSOs the power to penalize grid users and DSOs. On page 47, the GLDPM reads: *"TSO shall have the right to sanction insufficient data quality in an appropriate manner"*.

This statement is puzzling by itself, but combined with unbalanced requirements, it becomes even worse. On page 30, the GLDPM states that it would be impractical to impose reporting obligations on owners of type A power generating modules. However, a few lines later, the reporting obligation is assigned to the corresponding DSO, but the DSO does not get any means to impose this reporting obligation on the owners of type A power generators. To impose an obligation without a means to fulfill it, but with a sanction when the obligation is not met, is unfair and could harm DSOs.

We believe only a regulator should be able to sanction grid users and DSOs for a lack of compliance with European network codes and/or an inappropriate response to a TSO's request.

In addition, article 40(5) of the GL SO governs the applicability of articles 44 and 47-53 related to data exchange, and states that the specific scope of the data exchange should be determined in cooperation with DSOs and SGUs. The methodology should not be used to circumvent this requirement, yet ENTSO-E writes in the last paragraph on page 25 of the GLDPM that this methodology creates "a legal basis for the TSO's to demand that the data be made available". This is a critical issue for all grid users and DSOs.

A complementary consultation will be needed when the system operation guidelines are finalized

The CGMM refers in several instances to the system operations guidelines' requirements (GL SO). These guidelines are still under revision by the electricity cross-border committee, consequently the content of the CGMM in consultation is undefined. The consultation of CGMM is therefore premature and should be postponed or repeated when the final wording of the GL SO is known.

In addition, the CACM network code, and the GL SO both refer to a "common grid model" but there will probably be several CGMM:

- the CGMM mentioned in the CACM will be used for calculating cross-border capacity;
- the CGMM described in GL SO will be used for operational security analysis.

Both CGMM require different data setups, with a different level of details. The associations of DSOs expect that two consultations will be carried out, this one on the CACM, and another one on the GL SO (where the former might form the core of the latter).

ENTSO-E's methodology should follow a "protection by design" principle

The GLDPM seems to imply that TSOs will collect large volumes of data and then select the most relevant information. This approach will create unnecessary data collection costs and contradicts recent European efforts towards more data privacy and security.

For instance, the General Data Protection Regulation (to be adopted this spring) set the principle of data protection by design and by default for personal data: *"The controller shall implement mechanisms for ensuring that, by default, only those personal data are processed which are necessary for each specific purpose of the processing and are especially not collected or retained beyond the minimum necessary for those purposes, both in terms of the amount of the data and the time of their storage"*.¹

For critical infrastructure such as transmission and distribution grids, a similar principle should be applied. TSO should first carry out a sensitivity analysis of the system, and then define the data granularity needed.

No guarantee of harmonisation

The proposed methodologies give freedom to each TSO to define its own requirements. For instance, in the CGMM document:

- on page 54, *"the TSO has the right to choose if it provides a model with the lower voltage levels modelled in detail or not"*;

¹ Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), article 23 (2)

- on page 55 *"each TSO shall decide which lower voltage connections have to be taken into account for the proper modelling of generation"*;
- *"The process of reduction is optional, as noted above each TSO shall decide if it is needed. DSO networks in IGMs may also be included in full detail"*.

The GLDPM document also gives the TSO the freedom to define its own requirements:

- On page 42 *"Therefore, data on forecast active power output and active power reserves shall also be provided on a (D-2) basis along with any other information the TSO deems relevant."*

In addition, several paragraphs in the GLDPM consultation are unclear:

- *"As precise as possible, a breakdown of installed capacity on a nodal level"*;
- *"Expected changes to structural data for the relevant time horizons"*
- *"Power generating facility owners might be asked to indicate whether their power generating facility ..."* (p. 42).

The original purpose of the network codes was to improve security of supply and develop the internal energy market through a harmonised set of rules. The combination of letting each TSO design its own data requirements, and the lack of clarity of the proposed methodology will likely lead to very different methodology being used for each internal grid model. These various model then risk not to be reconcilable in a common grid model.