
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	TSOs' REPLY ("Clear and robust justification for including or not the views resulting from the consultation" (REG. 2015/1222: Article 12 (3)))	Changes to Methodologies and other to-dos
0224_A	EDF	(identical comment relating to GLDPM assigned to line 3838) (...) 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.	"(...) 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 see no need for modifying the methodology in the light of the comment. "(...) as well as in their regional or national implementation": Thank you for this very helpful suggestion: we propose to include it because it clarifies the requirements with respect to implementation in a constructive manner.	Include among "general provisions" a clause along the following lines: "Where the present methodology leaves discretion to TSOs in the implementation of the provisions set out therein, TSOs shall exercise that discretion in a manner consistent with the applicable rules and regulations (in particular as far as stakeholder involvement is concerned). For choices at national level, national rules and regulations shall apply; for choices at regional level, regional rules and regulations shall apply; for choices at European level, European rules and regulations shall apply. The relevant regulatory authorities shall ensure that the applicable rules and regulations are respected."
0262_A	IFIEC	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.	Thank you for this endorsement! We note, for the sake of completeness, that the comment does not suggest any modification to the documents.	
0268_A	EDF	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.	We agree with your comment and shall take it into account in the revision, because that will improve the quality (clarity) of the documents.	Revise the methodologies such that the legally binding passages are based upon the requirements of Regulation 2015/1222 only.
0268_B	EDF	(identical comment relating to GLDPM assigned to line 3882) 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.	Thank you for this endorsement! We note, for the sake of completeness, that the comment does not suggest any modification to the documents.	
0340_A	EURELECTRIC: Swedenergy: Energy Norway	A consultation of one month is too short a period for a complex document. 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.	We note, for the sake of completeness, that the comment does not suggest any modification to the documents. We appreciate that stakeholders would have wanted to have more time to respond to the consultation. However, the TSOs themselves are working under very tight deadlines. Not only did we respect the legal requirement set out in Regulation 2015/1222 Article 12 (1), we also announced the dates of the public consultation about four months in advance which gave stakeholders plenty of time to coordinate up front.	
0373_A	EURELECTRIC	We received as feed-back during the workshop that "no information of the CGM will be publicly disclosed to the market". We want to insist on the fact that the level of confidentiality should in a way be linked to the time horizon for which the grid model is elaborated. For instance, information of the grid models (including grid data) before D-2 should not be considered as confidential as it represents only the best possible projections from TSOs, which highly depend on TSOs assumptions. Disclosing 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 institutions and processes in place to monitor market abuse and therefore the TSO should not link their choice of market design to confidentiality issue.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"
0373_C	Energy Norway	We would like to underline that "confidentiality" has to be balanced with the necessary transparency for SGUs, whose economic decisions are influenced by the capacity made available on the market. For instance, information of the grid models (including grid data) before D-2 should not be considered as confidential as it represents only the best possible projections from TSOs, which highly depend on TSOs assumptions. Disclosing 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 institutions and processes in place to monitor market abuse and therefore the TSO should not link their choice of market design to confidentiality issue. In addition, we would like to re-iterate that there are institutions and processes in place to monitor market abuse and therefore the TSO should not link their choice of market design to confidentiality issue.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"
0373_D	IFIEC	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.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"
0373_E	EDF	1. Transparency on the Common Grid Model. EDF believes that the publication of nonconfidential 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).	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"
0380_A	Energy Norway: EURELECTRIC	We share everything stated at this point regarding the confidentiality of the data involved on this process. However, confidentiality should not be an argument to avoid transparency, especially when decisions have economic impact on SGU. We consider essential that the CGM were published by the RSC or TSO responsible for their technical validation through channels which give exclusive access to the SGUs. A good example of this practice is the procedure followed by the Spanish TSO (REE) which publishes daily on a private web the base cases (GM) used on the day-ahead technical constraints solution process.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"

0425_A	EDF	According to Section 5, Regional Security Coordinators (RSCs) are responsible for merging the IGMs of affiliate TSOs ensuring that their net positions are consistent. EDF recommends to clarify in this section the following points: i) the possibility for several RSCs to handle the IGM of a TSO; ii) the coordination procedures among RSCs to make regional CGMs consistent.	Following your suggestions improves the quality of the documents, so we will ensure that the following points are clearly stated in chapter 5 on merging: On (i): All RSCs will be technically able (i.e., will be able in principle) to handle all tasks related to each IGM On (ii): the CGM is a pan-European model by definition. There is no such thing as a regional CGM. Regional sub-sets of the CGM are by definition consistent because they are part of a consistent CGM (assuming, of course, that the CGM process results in a convergent CGM).	The editor to ensure that the following points are clearly stated in chapter 5 on merging: On (i): All RSCs will be technically able (i.e., will be able in principle) to handle all tasks related to each IGM. On (ii): the CGM is a pan-European model by definition. There is no such thing as a regional CGM. Regional sub-sets of the CGM are by definition consistent because they are part of a consistent CGM (assuming, of course, that the CGM process results in a convergent CGM).
0480_A	EURELECTRIC	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 CMG should provide the optimum solution given these constraints from a European perspective (treating all 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. This process should be transparent.	Your comment seems to relate to the capacity calculation methodology rather than the CGMM. Therefore we consider it out of scope of the CGMM and will not incorporate it.	
0482_A	EURELECTRIC	As formulated in GL CACM Article 3, another objective of the CGMM should be "(f) ensuring and enhancing the transparency and reliability of information". We believe this objective is very important and should explicitly be added after line 482. Moreover, in their Position Paper of CWE NRAs on Flow-Based Market Coupling, NRAs of the CWE region asked, as a first step towards the CGM, "the publication of grid elements characteristics (length, resistance, reactance, nominal capacity) for the CWE 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 CGMM fails to address the objective of transparency of information. We believe the CGMM should be the occasion to extend the publication of grid elements characteristics to the overall ENTSO-E network (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 CGMM in order to comply with GL CACM Article 3, paragraph (f). (The following sentences were only part of EURELECTRIC's comment.) Again, during the workshop we received as feedback that this kind of information is already published by some TSOs, but not all. We strongly advocate that the level of details on transparency should be further aligned among TSOs.	Thank you for this suggestion. We shall refer to all of the objectives listed in Article 3 of Regulation 2015/1222 as this would improve the quality of the documents. As for your request for the publication of additional data, please refer to the reply to comment 0380_A	State all of the objectives listed in Article 3 of Regulation 2015/1222 in the Methodologies.
0501_A	EURELECTRIC: Swedenergy: Energy Norway	TSOs should report to their NRAs if they do not choose to follow the recommendations of the RSC.	We take no view on your suggestion which we see as out of scope of the CGMM. It should more appropriately be covered in connection with the methodologies related to operational security pursuant to SOGL. Therefore we shall not modify the CGMM in light of the comment.	
0542_A	EURELECTRIC: Swedenergy: Energy Norway	(The three comments summarised here were not completely identical: the EURELECTRIC version was retained as it contained an additional request.) While short circuit and dynamic calculation are not required, and it is up to the TSOs within a capacity calculation region to decide whether to do the job or not, due to the complexity of the project (line 567/568). We would appreciate if there is a requirement to mention to the NRAs 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.	The CGMM covers processes at pan-European level. The decision on whether to exchange the data referred to in Article 19 (6) of Regulation 2015/1222 will be made at CCR level. Any additional explanations should also be provided at CCR level. Therefore we will not follow your suggestion. However, we will clarify the obligations pursuant to Article 19 (6).	Clarify the obligations pursuant to Article 19 (6).
0567_A	Swedenergy: Energy Norway	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.	The CGMM covers processes at pan-European level. The decision on whether to exchange the data referred to in Article 19 (6) of Regulation 2015/1222 will be made at CCR level. Any additional explanations should also be provided at CCR level. Therefore we will not follow your suggestion. However, we will clarify the obligations pursuant to Article 19 (6).	Clarify the obligations pursuant to Article 19 (6).
0658_A	EURELECTRIC: Swedenergy: Energy Norway	The TSOs should report and justify to their NRA, which level of modelling topology they choose in their IGM if there are good reasons for choosing either the node breaker or the bus branch topology and no requirement to harmonise.	We will not follow your suggestion of involving the NRAs as we see no added value in introducing an explicit requirement in this respect. The NRAs shall be charged with enforcing the methodologies which makes it possible for them to check on TSOs' decisions at any rate. However, we will reformulate the legally binding passages so as to restrict TSO discretion and so as to harmonise TSOs' approach in the following way: the default shall be for TSOs to use the node-breaker approach when preparing their IGM. Only where the cost (effort) of obtaining this degree of detail is not warranted, TSOs shall use the bus-branch approach instead.	Node-breaker vs. bus-branch modelling: we will reformulate the legally binding passages so as to restrict TSO discretion and so as to harmonise TSOs' approach in the following way: the default shall be for TSOs to use the node-breaker approach when preparing their IGM. Only where the cost (effort) of obtaining this degree of detail is not warranted, TSOs shall use the bus-branch approach instead.
0738_A	EURELECTRIC: Swedenergy: Energy Norway	"determine in a coordinated manner" - see below: this is not precise enough to describe the required cooperation between capacity calculation regions to make capacity between the regions available to the markets	We will not address this point in more detail as this is not within scope of the CGMM / GLDPM. Instead the manner in which capacity is made available to the market should be addressed in the capacity calculation methodology pursuant to Regulation 2015/1222 Article 21.	
0741_A	EURELECTRIC: Swedenergy: Energy Norway	While the capacity calculation methodologies will be developed at capacity calculation region level and are out of the scope of the CGM we would appreciate more provisions for coordination between regions at this stage of the process. The requirement in 738 is not precise enough and does not take into account that not only trade within an region needs to be optimised but also trade between regions.	We will not address this point in more detail as this is not within scope of the CGMM / GLDPM. Instead the manner in which capacity is made available to the market should be addressed in the capacity calculation methodology pursuant to Regulation 2015/1222 Article 21.	
0891_A	EDF	EDF takes note that injections and withdrawals at each node of the IGMs/CGMs correspond to "realistic and accurate forecasted aggregate amount". Although this information has to be consistent with SGUs declarations, it should be considered as purely indicative and should not represent commercially-sensitive data.	We will not address this point in more detail as the SOGL will only enter into force at a later stage and is, at any rate, out of scope of the CGMM / GLDPM. If and when the SOGL has entered into force, however, TSOs will be obliged to follow the provisions set out therein.	
0893_A	EDF	In ENTSO's proposal, the IGMs used to build the CGMs do not include internal congestions and voltage violations. This approach does not seem to be consistent with the provisions of CACM Regulation (Article 35) on coordination of actions aimed to relieve congestions. EDF would therefore recommends to keep internal congestions within IGMs before merging, so that RSCs can propose measures to alleviate those congestions.	We do not agree with your interpretation of Article 35 which in paragraph 4 only prohibits those "unilateral or uncoordinated redispatching and countertrading 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.	
0951_A	EURELECTRIC: Swedenergy: Energy Norway	While these scenarios are not mandatory at the European level, it would nevertheless be good to have an oversight which regions are performing these calculations/scenarios and why.	We appreciate your interest in this topic; however, we aim to keep coverage of the CGMM / GLDPM focused on the pan-European level. Any additional information is out of scope of the CGMM / GLDPM and should be provided at the relevant regional level. Therefore we will not incorporate your comment into the methodologies.	
1145_A	IFIEC	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.	While we shall, of course, follow the legislation 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.	

1145_B	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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"; 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 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.	First of all, we note that - contrary to what you imply - the merging process does not rely on IGMs having been developed in an identical manner in order to produce a CGM. The instances of TSO discretion that you describe are fully compatible with the requirement in Regulation 2015/1222 Article 19 (4). However, in order to make the documents clearer and to underline the target of harmonisation, we shall follow the spirit of your comment by proceeding as follows: --as for the choice between node-breaker and bus-branch modelling, please see the answer to comment 0658_A --as for the appropriate coverage of voltage levels, we shall revise the corresponding sub-section in the light of your comment	
1151_A	EURELECTRIC, Swedenergy, Energy Norway	We appreciate the ambition of the IGMs to not discriminate between market parties based on their location in the grid. We would appreciate that at this part of the guideline there are provisions for insight into each national IGM by regulators and stakeholders to ensure that national models are indeed correct.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic. As for whether the IGMs are correct, this is checked via the processes described in chapter 05 and 08.	See note with filename "transparency"
1276_A	EURELECTRIC, Swedenergy, Energy Norway	(The three comments summarised here were not completely identical; the EURELECTRIC version was retained as it contained an additional request.) Again at this point we would appreciate insight in the national IGM. Internal modelling details become important when the IGM does not contain just one price area, but several. Internal modelling in this case might not influence what happens between the control areas, but it has impact on the prices the market participants face in different price areas that are modelled as one in the IGM. As market participants we believe that any data that could influence the wholesale prices should be made available to the market.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"
1400_A	EURELECTRIC, Swedenergy, Energy Norway	This paragraph does not just apply to wind farms and PV but should also apply to run-of-river plants that have several small transformers. There not every single transformer should be reported (they can't - the exact distribution of production is random between them) but these run of river plants should be considered as a single power generating module like wind farms and PV.	Thank you for this suggestion which we are happy to implement.	Make it clear that several small run-of-river plants may be aggregated into a single generation unit in the modelling in the same way as solar PV and wind
1478_A	EURELECTRIC, Energy Norway, Danish Energy Association	"The load shall be separated from the active power injection of generating facilities connected to the grids of the distribution companies (DSO or DNO)." It is not possible to separate load from power injection of generating facilities for installation connected generators (roof-top PV or similar - here among huge parts of the large numbers of Type A generation). Only production from generators which are directly connected to the network are measured. Online measurement of all power injections into the distribution grid will be costly, and has to be justified with a CBA.	Please note that the passage in the CGMM that you refer to is not asking for online measurement which is generally out of scope of the CGMM. Next, we appreciate your concern with respect to the separation of load and generation. The fairly low voltage levels where the challenge that you describe could arise are not within scope of the CGMM. Therefore we believe that your concerns are unwarranted. However, we think it useful to clarify that point so we shall revise the wording to indicate that load shall be modelled separately from generation only in the case of those generation units that are modelled in detail, not in the case of those that are modelled on an aggregate basis.	Revise the wording to indicate that load shall be modelled separately from generation only in the case of those generation units that are modelled in detail, not in the case of those that are modelled on an aggregate basis.
1507_A	EURELECTRIC, Energy Norway, Danish Energy Association	"In view of the explanations in sub-section 3.2.1, the TSO has the right to choose if it provides a model with the lower voltage levels modelled in detail or not." Verified and calculation-ready detailed models of distribution grids require a high amount of workforce to produce and maintain. TSO should only be able to demand such models on a "need to" basis, justified by a CBA. If a need is judged as reasonable and proportional to the cost by the National Regulatory Authority, alternative solutions to delivering network models must be considered.	We do not agree on the need for a cost-benefit analysis in order for a TSO to be allowed to obtain the data required to build a proper IGM. While it may be possible to estimate the costs of providing additional data with reasonable accuracy, the benefits can only be estimated with a very large margin of error. We thus question the value of conducting a cost-benefit analysis (which in itself is costly in terms of time and effort), so we shall not incorporate that aspect of your comment into the Methodologies. If the NRAs are not convinced by our proposal they will demand the corresponding amendments. However, we propose to incorporate your comment in the following way in the revision: We will discuss the subject of cost-benefit analysis in general terms and we will generally require TSOs to request only those data that they need for the purposes of implementing the applicable legislation, specifically, Regulation 2015/1222. This also means that the formulation that you disagree with ("the TSO has the right to choose if it provides a model with the lower voltage levels modelled in detail or not") shall be replaced with an alternative formulation.	We will discuss the subject of cost-benefit analysis in general terms and we will generally require TSOs to request only those data that they need for the purposes of implementing the applicable legislation, specifically, Regulation 2015/1222. The contested formulation ("the TSO has the right to choose if it provides a model with the lower voltage levels modelled in detail or not") shall be replaced with an alternative formulation.
1523_A	EURELECTRIC, Swedenergy, Energy Norway	As above: while it makes sense to reduce the modelling complexity of each IGM from an IT point of view, in case where there exists internal bidding areas with resulting different prices, the model needs to remain complex enough. Again there is transparency and insight required for the NRA and stakeholders.	We interpret your comment as saying that the IGM needs to be fit for purpose. We agree with that statement and note, for the sake of completeness, that you are not suggesting changes to the documents. To the extent that the last sentence is a request for the publication of additional data, please refer to the answer to comment 0380_A	
1560_A	Danish Energy Association	[concerns lines 1560 to 1564] "After the proper modelling of the topology of DSO networks and connected generation and load the distribution networks may be finally reduced as: a load, a generation and equivalent branches connected to the transmission level. This is a less detailed representation of those parts of the system. 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." It should be allowed that the DSO performs such network reductions, if it can be demonstrated that this is more efficient.	Thank you for the observation. In our view this point is already made in Regulation 2015/1222 Article 81 on delegation, so we see no need to revise the methodologies in this respect.	
1619_A	EURELECTRIC, Swedenergy, Energy Norway	TSOs should reform their relevant regulator which modelling way they chose and why.	We understand your comment as suggesting that the CGMM should contain a requirement for TSOs to inform their regulator which way of modelling HVDC interconnectors they choose. We do not agree with this suggestion, because we do not think that it would add any value. The decision with respect to how to model an HVDC interconnector - in a detailed or in a simplified manner - is driven by the functions used on the interconnector which need to be agreed among the TSOs concerned. As for what functions are used and, more generally, how the interconnector is operated is an entirely separate question that is out of scope of the CGMM.	
1708_A	EDF	In ENTSOE's proposal, the IGMs used to build the CGMs do not include internal congestions and voltage violations. This approach does not seem to be in line with the provisions of CACM Regulation (Article 35) on coordination of actions aimed to relieve congestions. EDF would therefore recommends to keep internal congestions within IGMs before merging, so that RSCs can propose measures to alleviate those congestions.	We do not agree with your interpretation of Article 35 which in paragraph 4 only prohibits those "unilateral or uncoordinated redispatching and countertrading 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 shall not incorporate your comments into the document.	
1928_A	EURELECTRIC, Swedenergy, Energy Norway	TSOs should report to their NRAs if they do not choose to follow the recommendations of the RSC and do not update their IGM according to the RSCs recommendations.	Please refer to the answer to comment 0501_A	

2152_A	EDF	In order to i) facilitate the provision of accurate data by SGUs until D-2, ii) allow market parties to schedule maintenance, and iii) strengthen the investment signals in relevant locations, TSOs should publish CGMs in their full extent (including forecasts on variable data and not only structural data) corresponding to all time horizons before D-2 (i.e. yearly, monthly, and weekly updates of the CGMs). As agreed by the speakers at ENTSO-E's workshop on February 18, there is no reason to keep CGMs data confidential before D-2, as they only represent TSOs forecasts. 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) to enable market parties to better anticipate short term evolutions of market prices without having to disclose any confidential or sensitive information.	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Please see our detailed explanation on this topic.	See note with filename "transparency"
2516_A	EURELECTRIC	(This comment was originally labelled "General comment", but we believe that it should more appropriately refer to the CGMA process - thus the assignment 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-fulfilling prophecies as this incorporates possible inefficiencies from the past. We suggest to start the process based on an unconstrained CMG as input for all IGMs 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). Contrary to your suggestion, in the CGMA step the CGM process effectively starts without constraints as the CGM algorithm can adjust the feasibility ranges submitted. Therefore we see no reason to modify the methodology in this respect.	
2586_A	EURELECTRIC ; Swedenergy ; Energy Norway	Likewise 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 CGMM. Therefore, your comment should be raised in connection with the public consultation of the capacity calculation methodology.	
2615_A	EURELECTRIC ; Swedenergy ; Energy Norway	This is not specific enough - if the dimension of the bidding zone is taken into account - will bigger zones face bigger adjustments than smaller zones? Or does it mean the reverse? Will it lead to advantages of bigger zones compared to smaller zones in the modelling process or not?	Thank you for this comment. We shall revise the corresponding passage of the CGMM to make it clear that the CGM algorithm 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 correlated with 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 (preliminary net position). Therefore, a "smaller" bidding zone does not necessarily have to make a smaller adjustment than a "larger" bidding zone. We do not think it correct to speak of "advantages" for any party in that the CGMA process 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 nature of each bidding zone.	Revise the corresponding passage of the CGMM to make it clear that the CGM algorithm 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 correlated with 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 (preliminary net position). Therefore, a "smaller" bidding zone does not necessarily have to make a smaller adjustment than a "larger" bidding zone.
2644_A	EURELECTRIC ; Swedenergy ; Energy Norway	If the calculation in the processing phase is done by the RSCs - how is it ensured that the RSCs cooperate with each other and that they also optimise the trade between RSCs not just within RSCs? We would appreciate an additional paragraph, describing the cooperation between RSCs in setting capacity for the markets	The actual capacity calculation process is out of scope of the CGMM, as is the cooperation of RSCs during that process. Therefore we see no need to revise the CGMM in the light of the comment. As for the cooperation between RSCs during the CGMA process, the CGMA module will be a central IT system accessible to all RSCs: each RSC would in principle be able to operate this module, and the CGMA process relies on a unique and transparent methodology shared by all TSOs. However, this is already explained in the CGMM, so we see no need to revise the document.	
2679_A	EURELECTRIC ; Swedenergy ; Energy Norway	A sentence should be added to that paragraph, saying that if the TSOs deviate in their final IGM from the recommendations of the RSC or the CGM result, they should report to the NRA, why they chose to deviate.	Please refer to the answer to comment 0501_A	
2937_A	EDF	The substitution of IGMs in the short time horizons (DA and ID) should be totally transparent towards market participants. As regards the year ahead timeframe, where no substitution rules are envisaged, TSOs and RSCs should be accountable for the timely provision of IGMs.	These are helpful suggestions. We will address the first point on the substitution of IGMs in connection with quality monitoring and we will make the mandatory character of the timely provision of IGMs (not only the longer-term ones) clear.	IGM substitutions shall be documented and the corresponding statistics shall be regularly published; this requirement shall be added to the quality monitoring chapter. The legally binding passages of the CGMM shall make clear the mandatory character of the timely provision of IGMs (i.e., IGMs for all time-frames).
2945_A	EDF	The substitution of IGMs for the short time horizon (D-1) and intraday 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 substitution rules are applied, TSOs or RSCs should be accountable for the coordination process used to obtain an IGM at European level	Please see answer to comment 2937_A.	
3038_A	EURELECTRIC ; Swedenergy ; Energy Norway	If a TSO disagrees with the recommendation of a remedial action by the RSC, they should report to the NRA, why they disagree to use the remedial action.	Please refer to the answer to comment 0501_A	
3273_A	EURELECTRIC	According to the specific deadline established to the D-1 horizon, at 19:00, the validated CGM for all scenarios will be available on OPDE and is expected that the remedial actions (agreed measures), if necessary, will be included in the next IGM at 22:15. We consider that it is very important to minimize the length of proceedings because this deadline could be incompatible with thermal units start-up processes, thereby reducing the number of units that could be selected to implement remedial actions	The deadlines proposed reflect the operational requirements of all TSOs involved in the CGM process 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 CGMM in the light of your comment.	
3379_A	EDF	Section 8 of the consultation document mentions that RSCs are responsible for the quality check of IGMs and CGMs. In our view, the indicators proposed in Sections 8.2 and 8.3 are more related with "consistency" of the IGMs and CGMs than with the "accuracy" of forecasts 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 IGMs, 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 IGMs and CGMs. These indicators could then be periodically disclosed and commented, enabling all interested parties to improve their own approaches.	These are helpful suggestions in that the publication of suitably chosen quality indicators could improve the CGM process. We shall, for the time being, use statistics on IGM substitutions as well as an ex ante vs. ex post comparison of net positions as quality indicators and regularly publish these.	Revise chapter on quality monitoring and require TSOs to regularly publish statistics on IGM substitutions as well as an ex ante vs. ex post comparison of net positions as quality indicators.
3483_A	EDF	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	Please refer to the answer to comment 3379_A	
3485_A	EDF	The general implementation timescale presented during the ENTSO-E workshop of February 18th should be included for the sake of transparency in section 5 of the draft methodology. Furthermore, if NRAs require some amendments of the methodology before their approval, market parties should be informed to be able to adapt and to ensure the implementation of the requested evolutions.	The timescale 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 us incorporating outdated material into the methodologies. Thank you for the helpful suggestion of keeping stakeholders up-to-date on the status of the methodologies; we will add a reminder for ourselves to ensure that stakeholders are kept informed on the approval process and any possible amendments requested via the ENTSO-E website and email newsletter. We note for the sake of completeness that this part of your comment does not request any modification of 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.

3518_A	EURELECTRIC	The CGM foresees a 36 month delay of application. It reads very long and could be poorly motivating for most advanced regions to complete shortly ongoing projects. In order to save time in the decision process, market participants suggest TSOs to share with NRAs the comments received on this consultation. This will enable NRAs to share their key concerns and avoid that market parties start preparing for nothing. It is essential to speed up the process as the common grid model will provide the basis to perform the capacity calculation.	We read your comment as suggesting that (i) the timescale for implementation be sped up and (ii) the NRAs be informed about stakeholders' comments and TSOs' proposed response. We believe that it would be in everyone's interest for the CGMM to be implemented as soon as possible and we shall therefore review the proposed timescale with respect to whether it can be sped up and, if possible, revise the corresponding chapter accordingly. We note, for the sake of completeness, that the second part of the comment does not require any changes to the documents. However, we believe your suggestion to be helpful so, following the approval of the stakeholders who provided comments, we shall be sharing the comments and the TSOs' proposed reply with NRAs.	Review the proposed timescale with respect to whether it can be sped up and, if possible, revise the corresponding chapter accordingly. Following the approval of the stakeholders who provided comments, we shall be sharing the comments and the TSOs' proposed reply with NRAs.
3709_A	SSE; EURELECTRIC	(Wording of original comments was not exactly identical.) Given the constant references to 'GL' in the document it would make it easier to read the whole document if you amended references to guidelines in the following way - "guideline on Capacity Allocation and Congestion Management (henceforth 'CACM' in this document)." The same should be done for FCA and the Transmission System Operation Guideline /TSOG/ as it has been referred to in other documents.	Thank you for these suggestions. We are not sure how widely shared your objections against the use of "GL" are, but if you would find the documents easier to read with "GL" replaced, we are happy to oblige. We shall refer to Regulation 2015/1222 to distinguish the CACM GL (already in force) from the two drafts which we shall abbreviate FCA and SO, respectively.	Replace references to the three relevant Guidelines with the following: Regulation 2015/1222 FCA SO
3711_A	SSE; EURELECTRIC	(Wording of original comments was not exactly identical.) Quotes from another text, such as CACM, should be placed in italic; i.e. "delivery of the generation and load data required to establish the common grid model". References to a particular Article and paragraph in CACM etc., from where the quote came from are very helpful – but should be a 'footnote' rather than "[GL CACM Article 16 (1)]." This will allow the text to flow much better for the reader.	We believe that the use of italics as suggested in the comment would improve the readability of the methodologies, so we shall follow this suggestion. As for turning the references into footnotes, we have not had that request from anyone else. On the one hand and as you suggest, moving the references to footnotes might make for an easier flow of the text; on the other hand, it would make it more cumbersome to check the references especially if the documents are read on a computer screen. Given that the net benefit of following the suggestion are not clear and given the intense time pressure, we shall not be implementing this part of your suggestion.	Mark direct quotes from legislation with italics
3741_A	SSE; EURELECTRIC	(Wording of original comments was not exactly identical.) It would be helpful to the reader to clearly set out in this document here (via a footnote?) where the present methodology is expected to be implemented in terms of jurisdictions outside the EU – otherwise it begs the question, if it is not to be set out here, then where is it to be set out??	We see no need to revise the methodologies as the table in the Annexes (in the case of the GLDPM cf. lines 4825 et seq.) already provides the information you are looking for.	
3782_A	SSE; EURELECTRIC	The wording "(typically the National Regulatory Authority)" is legally incorrect with respect to CACM. The CACM multiple TSO Article is materially different to the similar Article in the other Guidelines / Network Codes: such as that in the RfG. Those documents include the words "Member States may, under the national regulatory regime, provide that the responsibility of a TSO to comply with one or some or all obligations under this Regulation is assigned to one or more specific TSOs". The words "under the national regulatory regime" is not in the Article in CACM. It cannot be assumed that the CACM wording permits the Member State to delegate this power to the NRA – If this were the case then there would not have been any need to change from the CACM wording in respect of multiple TSOs in later Network Codes / Guidelines.	Thank you for this comment. In the interest of avoiding confusion we shall remove the phrase in parentheses as suggested. It is not, at any rate, essential for the methodologies to which institution these powers are assigned.	Phrase "(typically the National Regulatory Authority)" already removed in both Methodologies
3798_A	SSE; EURELECTRIC	As per the comments under 3709 above "GL SO" refers to the Transmission System Operation Guideline. It has been referred to as 'TSOG' in other documents.	We shall be referring to SO. Please refer to the answer to comment 3709_A.	
3838_A	EDF	(identical comment relating to CGMM assigned to line 0224) (...) 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.	Please refer to the answer to comment 0224_A	
3882_A	EDF	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.	Please refer to the answer to comment 0268_A	
3882_B	EDF	(identical comment relating to CGMM assigned to line 0268) 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.	Please refer to the answer to comment 0268_B	
3882_C	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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).	The CGM will be used for different purposes, but it will be the same CGM. There will indeed be a separate consultation for submission under each of the relevant Regulations (Guidelines). We note, for the sake of completeness, that the comment is not suggesting changes to the methodologies.	
3887_A	EDF	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 entered into force. EDF 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.	Please refer to the answers to comments 0268_A and 0268_B	
3887_B	SSE; EURELECTRIC	The suggested approach in this sentence of including text "...for informational purposes and for the sake of consistency, but for the time being they are not binding..." is welcomed – it allows the reader to see what is planned. That having been said, it would be helpful (perhaps by either using different colour text or by use of footnotes) to make clear where this is the case, so that the reader knows which parts of the methodology are or are not binding on parties. For the avoidance of doubt, our comments here are only in relation to this version of the methodology – we reserve the right to make additional comments to any subsequent changes to this methodology arising from the entry into force of other Guidelines and / or Network Codes.	This comment suggests modifications to the methodologies that would improve the quality (clarity) of the documents, so it shall be taken into account in the revision. Each time a methodology is being prepared under one of the three Regulations (Guidelines) referred to there will indeed be a public consultation. We note, for the sake of completeness, that the corresponding part of the comment does not require changes to the methodologies.	Revise the methodologies such that the legally binding passages are based upon the requirements of Regulation 2015/1222 only.

3917_A	SSE: EURELECTRIC	The proposed approach of linking "each requirement set out in the methodologies individually back to a provision in one of the items of legislation" is very welcome. It makes for a clear audit trail from the methodology to the appropriate Guideline / 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	
3921_A	SSE: EURELECTRIC	Given the legal nature of the methodology, should "noted" be changed to "stated"?	Thank you for the suggestion which we shall implement because it may improve the clarity of the document.	Revise the sentence in lines 3921 et seq. of the GLDPM such that it reads "Finally, unless otherwise stated, material included in an annex to the present methodology is not meant to be legally binding and does not, therefore, require approval by all regulatory authorities."
3929_A	SSE: EURELECTRIC	The statement that any 'reasonable' adjustment by a TSO of the deadlines "...shall not be considered an amendment in the sense of GL CACM Article 9 (12) and shall not require re-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 3938, generators or load units 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 load unit to know what (a) 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 approvals process then there is a serious risk that TSOs could (would?) include 'false' or 'artificial' deadlines in the methodology they present for approval to the regulatory authorities; knowing that shortly after it has been approved they could (unilaterally) change the deadlines to what they actually want – those 'real' deadlines, had they been known to stakeholders and the regulatory authorities prior to the methodology being approved, may have led to the methodology not being approved.	We will take into account your comments because this ensures that the interests of data providers are taken into account in a more appropriate manner.	Revise the GLDPM in the following way: (i) the GLDPM shall specify default deadlines for data provision; (ii) 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, but it shall not set more constraining deadlines; (iii) If, at any point in time, 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)
3938_A	EURELECTRIC	add: "if the data is not already available otherwise" to avoid double reporting	We will take into account your comments because this 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 quotation is a direct quotation from legislation which we would not want to modify.	See note with filename "principles_for_revision_of_GLDPM"
3941_A	EURELECTRIC	add: "if the data is not already available otherwise" to avoid double reporting	Please refer to the answer to comment 3938_A	
3975_01	EURELECTRIC	(concerns sub-line 01) illogical: day-ahead should be (D+1)	Day-ahead refers to the day before delivery. The day of delivery is D; e.g., 2016-04-04. Therefore, the day before delivery is 2016-04-03; i.e., (D-1). We note, for the sake of completeness, that we see no need to modify the document in light of your comment.	
3975_21	SSE: EURELECTRIC	(concerns sub-line 21) As per the comment above under 3709, delete 'GL'	Please refer to the answer to comment 3709_A	
3975_22	SSE: EURELECTRIC	(concerns sub-line 22) As per the comment above under 3709, delete 'GL'	Please refer to the answer to comment 3709_A	
3975_23	SSE: EURELECTRIC	(concerns sub-line 23) As per the comment above under 3709, delete 'GL' and change to 'TSOG' (as it has been referred to in other documents)	Please refer to the answer to comment 3709_A	
3975_45	SSE: EURELECTRIC	(concerns sub-lines 45 and 47) There appears to be no difference between 45 and 47 in that both come from the same source. Makes sense to standardise on a single Term.	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 remove "Primary owner of the data".	Remove "Primary owner of the data" from the list of definitions.
3975_59	EURELECTRIC	(concerns sub-line 59) illogical: year-ahead should be (Y+1)	Year-ahead refers to the year before the year of delivery. The year of delivery is Y; e.g., 2016. Therefore, the year before the year of delivery is 2015; i.e., (Y-1). We note, for the sake of completeness, that we see no need to modify the document in light of your comment.	
3978_A	IFIEC	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 position on the model reduction for CDSs in the observability area of the TSOs, again to take a pragmatic approach.	Thank you for your encouraging remarks! 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 strict minimum of data shall be requested because this reduces the burden on data providers while allowing the TSOs to meet their legal obligations.	See note with filename "principles_for_revision_of_GLDPM"
4001_A	EURELECTRIC	in doubt 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 filename "principles_for_revision_of_GLDPM"
4002_A	SSE: EURELECTRIC	Add in at the end of the paragraph: "TSOs will seek views from primary data owners about other existing data sources; such as that provided under REMIT and / or the Transparency Platform as well as existing national arrangements; that can be used to avoid any inefficiencies 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 filename "principles_for_revision_of_GLDPM"
4032_A	Danish Energy Association	and other types of hybrids (e.g., aggregators). Aggregators are not mentioned in section 1.7	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 IGMs.	Add aggregators (both of generation units and of demand facilities) to the list of data providers whose data may be required in order to build IGMs.

4056_A	EURELECTRIC_Swedenenergy_Energy Norway	(The three comments summarised here were not completely identical: the EURELECTRIC version was retained as it contained an additional observation.) Where additional material is required it should be clearly referenced in the text. Existing data reporting requirements namely in the Transparency Regulation and REMIT should be referenced as well. If additional material is required it should be made clear why it is needed and that where existing, existing reporting channels should be used to avoid the necessity for establishing additional reporting channels which come together with new process and new cost (IT system, etc.) for the data provider.	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 filename "principles_for_revision_of_GLDPM"
4062_A	P2 Analysis: Energy Networks Association: EURELECTRIC	It is not appropriate for all TSOs to pre-ordain the detailed data transfers on a national basis. The overarching approach of the TSOG (ie GL SO) is to allow regional needs to define data, and hence the cost of data collection. Consistency is fine (line 4066), but national freedoms to define the fine detail must not be infringed. We note that around line 4070 this flexibility appears to be recognized.	The comment would appear to be due to a misunderstanding. As recognised in the last sentence of the comment and explained in the GLDPM (lines 4068 et seq), the GLDPM aims to allow for maximum flexibility. We trust that you will be reassured by the principles that we shall use for the revision of the GLDPM as described in the note referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4065_A	SSE: EURELECTRIC	The working groups should also liaise with primary data owners as well. Amend this line to read "...will be liaising closely, and shall engage with primary data owners, with a view to ensuring a consistent set of documents."	The draft SOGL has since been superseded by an updated draft that explicitly stipulates that the Data Exchange methodology under SOGL "shall take into account and complement where necessary the operational conditions of the" GLDPM. As for the GLDPM, we are happy to include your suggestion that, as part of national implementation, TSOs shall engage with primary data owners. We trust that you will be reassured by the principles that we shall use for the revision of the GLDPM as described in the note referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4068_A	IFIEC	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.	Your comment is very much in line with the philosophy that the GLDPM is based upon - cf. lines 4068 et seq. Note that the draft SOGL has since been superseded by an updated draft that explicitly stipulates that the Data Exchange methodology under SOGL "shall take into account and complement where necessary the operational conditions of the" GLDPM. Therefore, the methodology to be developed under the SOGL shall be in line with the GLDPM and not conversely. The SOGL also has not entered into force yet. We note, for the sake of completeness, that this means that your comment shall not be incorporated into the GLDPM.	
4070_A	SSE: EURELECTRIC	It is inaccurate to state that "...TSOs are allowed but not obliged to request from the various parties listed below". TSOs are not free to ask for anything – they can only ask for that information they need from the primary data owner in order for the TSO to perform their legal duties – they cannot ask for data beyond this. This is also made clear in 4319 - "...TSOs to obtain the data needed for building the IGMs...". This line should read "...that TSOs are reasonably allowed but not obliged to request from the various parties listed below in order to perform their legal obligations."	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 filename "principles_for_revision_of_GLDPM"
4074_A	Danish Energy Association	[Concerns lines 4074 to 4075] TSOs will normally draw on the existing IT infrastructure and data provision processes which should simplify implementation. TSO's should provide documentation on the overall societal value-calculation in order to require new IT infrastructure and data provision processes.	Please refer to the answer to comment 1507_A	
4078_A	EURELECTRIC_Swedenenergy_Energy Norway	"It will be up to local TSOs to avoid." is not specific enough. It should say: "local TSOs are committed to set up a process that ensures that, ideally, every data supplier has a single point of contact and has to supply each data set only once. The NRAs should address situations where this is not the case in order to find workable solutions for both data providers and the TSOs". Everything other increases cost for producers and consumers and double reporting leads to mistakes and inconsistencies.	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 filename "principles_for_revision_of_GLDPM"
4078_B	Danish Energy Association	[Concerns lines 4078 to 4079] It will be up to local TSOs to avoid, to the extent possible, the need for duplicate data submission by cooperating with their local data suppliers TSO's should provide documentation on the overall societal value-calculation in order to require duplicate of data submission.	We agree with your suggestion that there should be no double-reporting of data because this would ensure that the costs to data providers are minimised while still allowing the TSOs to meet their legal obligations. We will incorporate this principle into the revised GLDPM; please see the note referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4090_A	EDF	(identical comment relating to line 4785) 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.	We agree with you that TSO discretion shall be circumscribed. The revised GLDPM shall provide maximum lists of data that may be requested and default deadlines, so that TSOs cannot increase, but can only lower the burden on data providers. The requirement to avoid double-reporting shall also become binding. Implementation shall be according to national rules which will in many cases entail the consultation of stakeholders. We trust that the principles for the revision of the GLDPM described in the note referred to on the right address your comments in an adequate manner. For the sake of completeness we note that your comments shall be taken into account because they limit the burden to data providers while still allowing TSOs to meet their legal obligations.	See note with filename "principles_for_revision_of_GLDPM"
4090_B	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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.	Your comment raises some concerns that data providers may legitimately have, so we shall take it into account. We trust that the principles for the revision of the GLDPM summarised in the note referred to on the right address your comment in an adequate manner. We note, for the sake of completeness, that your concerns with respect to the SOGL cannot be addressed at present in that the SOGL has not yet entered into force.	See note with filename "principles_for_revision_of_GLDPM"

4090_C	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	<p>No guarantee of harmonisation</p> <p>The GLDPM document also gives the TSO the freedom to define its own requirements:</p> <ul style="list-style-type: none"> • 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." <p>In addition, several paragraphs in the GLDPM consultation are unclear:</p> <ul style="list-style-type: none"> • "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). <p>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.</p>	<p>We will take into account your comment because this ensures that a number of legitimate concerns that stakeholders may have with respect to the GLDPM are addressed. Please see the note referred to on the right.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>
4110_A	EURELECTRIC	<p>"The present methodology does not raise objections to owners / primary data owners delegating their data provision tasks to third 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"</p> <p>It should say:</p> <p>"The present methodology does not raise objections to owners / primary data owners delegating their data provision tasks to third 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"</p> <p>Local TSOs should not have the right to deny to a certain owner/primary data owner the delegation of the data provision</p>	<p>The revised GLDPM shall make it clear that delegation of tasks related to data provision is to be governed by the principles set out in Regulation 2015/1222 Article 81. We believe that this would address your comment in a suitable manner. Please see the note referred to on the right.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>
4121_A	EDF	<p>(also concerns line 4537)</p> <p>In relation to the previous comment, for structural data, the draft methodology mentions GL SO (article 48(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 suggests 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."</p>	<p>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 "immediately" and it is not "as soon as possible". The revised GLDPM shall provide for a referee role for the NRA, so that should allay concerns in this respect. Please see the note referred to on the right.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>
4125_A	SSE; EURELECTRIC	<p>In terms of "The requirement set out here is stricter than similar provisions ..." and supersedes those less strict provisions [set out in Guidelines]" - is this legally permissible? Taking account of the Meroni Doctrine, we do not think it is possible for the TSOs (even with NRA approval) to enact legally binding requirements in a subsidiary document (this methodology) which supersedes those requirements agreed in accordance with the Treaties of the Union.</p>	<p>The formulation 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 indeed stricter than those in the SOGL and we do believe that this is justified by the specific uses to which the data will be put under the GLDPM and Regulation 2015/1222.</p>	<p>Revise the sentence "The requirement set out here is stricter 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 DSO to "provide the TSO with an update of the structural information (...) at least every six months.") and supersedes those less strict provisions." to read "The requirement set out here is stricter 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 DSO 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."</p>
4129_A	SSE; EURELECTRIC	<p>"...TSO may agree on alternative arrangements with its data providers subject to the TSO meeting its own responsibilities vis-à-vis the other TSOs."</p> <p>As per Article 6(5) of the TSOG, the National Regulatory Authorities should be involved.</p> <p>Amend this line to read "...TSO may, subject to NRA approval, agree on alternative arrangements with its data providers..."</p>	<p>The revised GLDPM shall provide for a referee role for the NRA; please see the note referred to on the right. However, we would not want to impose this specific requirement for NRA approval even in those cases in which all parties involved are happy with the "alternative arrangement" 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.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>
4133_A	SSE; EURELECTRIC	<p>"An individual TSO may set stricter deadlines..."</p> <p>Firstly, as per the comments under 4125, we are not certain that this is legally permissible in terms of the Meroni Doctrine.</p> <p>Secondly, even if legally permissible, as per 3929 the subsequent unilateral amendment by the TSOs of deadlines after the methodology has been approved by NRAs is unacceptable from a stakeholders' perspective.</p>	<p>Please refer to the answers to comments 3929_A and 4125_A</p>	
4134_A	EDF	<p>(also concerns line 4390)</p> <p>The line 4390 refers to "TSOs 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 SGUs are not clearly mentioned in the draft GLDP methodology, while Article 16(4) of CACM Regulation provides that: "the methodology shall specify the deadlines applicable to generation units and loads for providing the information". The draft methodology seems to postpone to local implementation TSOs' decisions on these deadlines to ensure consistency with local market rules. Nevertheless, EDF believes that all the deadlines imposed to data providers should be in any case submitted to public consultation before their final approval by NRAs in accordance with Article 16(4) of CACM Guidelines. 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).</p>	<p>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.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>
4135_A	Svedenergy; Energy Norway	<p>If a TSO sets stricter deadlines it should be required to provide a justification for those stricter deadlines.</p>	<p>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.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>

4138_A	IFIEC	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.	Your comment is already included in the GLDPM: cf. lines 4167 to 4168: "(...). TSOs are encouraged to include in their IGM only the degree of detail that is required for the purpose for which the model is being established." For the sake of completeness we note that your comment does not require modifications to the methodology. Having said that, we propose to revise the GLDPM based on the note referred to on the right which clearly includes the principle that you advocate.	See note with filename "principles_for_revision_of_GLDPM"
4138_B	IFIEC	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 actors [FN: 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.] 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.	Your comment reflects reasonable concerns which we are keen to address to the extent that the current methodology is not yet clear enough. We shall revise the GLDPM on the basis of the outline referred to on the right which is very much in line with your suggestions.	See note with filename "principles_for_revision_of_GLDPM"
4140_A	Danish Energy Association	[Concerns lines 4140 to 4162] Since the CGM is foreseen for voltage levels at 220 kV and above, the possibility of TSOs providing aggregated data with respect to generation and load data should be included in the methodology.	This possibility has already been included in the GLDPM; cf. lines 4158 et seq.	
4164_A	Danish Energy Association	[Concerns lines 4164 to 4168] TSO's should provide documentation on the overall societal value-calculation in order to require aggregation on distribution level, especially where the distribution level ends at 50-60 kV	Please refer to the answer to comment 1507_A We shall also briefly address the subject of cost-benefit analyses in the cover note for the present set of comments.	
4165_A	EURELECTRIC	"It is in principle at each TSO's discretion to decide which degree of granularity to implement in its IGM" As per Article 19 (4) of CACM GL, "All TSOs shall harmonise to the maximum possible extent the way in which individual grid models are built" It should say: "It is in principle at each TSO's discretion to decide which degree of granularity to implement in its IGM. TSOs shall harmonise to the maximum possible extent the degree of granularity to implement in its IGM, trying to minimise the information required to primary data owners. Extra requirements shall be justified only by its cross-border impacts"	Thank you for pointing out a formulation that might be understood as being in conflict with the harmonisation requirement in Article 19 (4). We think it important to resolve the resulting confusion and we propose to do this by revising the GLDPM based on the outlined referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4171_A	Moyle Interconnector Ltd.	To avoid any doubt section 1.7 could be clarified by making a clear statement "this methodology is not applicable to interconnectors operated by certified TSOs". In any case, it does not seem that this particular methodology is the appropriate place to refer to collection of data for any interconnectors, as they are a network element rather than a source of generation or demand.	On the first point: OK, we will clarify this. Interconnectors operated by certified TSOs are out of scope of the GLDPM and are not required to provide data under the GLDPM where the responsibility for complying with the corresponding obligations has been assigned to another TSO pursuant to Article 1 (3) of Regulation 2015/1222. Also note that all TSOs are free to delegate tasks assigned to them by Regulation 2015/1222 in accordance with Article 81 of the Regulation. On the second point: In lines 4027 et seq we explain that "the GLDPM encompasses all injections ("generation") into and withdrawals ("load") from the transmission system." Interconnectors are therefore clearly within scope of the GLDPM.	Make it clear that interconnectors operated by certified TSOs are out of scope of the GLDPM and are not required to provide data under the GLDPM where the responsibility for complying with the corresponding obligations has been assigned to another TSO pursuant to Article 1 (3) of Regulation 2015/1222. Also note that all TSOs are free to delegate tasks assigned to them by Regulation 2015/1222 in accordance with Article 81 of the Regulation.
4198_A	EURELECTRIC , Danish Energy Association	(concerns lines 4198 to 4199) Distribution systems, NEMOs brokers cannot be categorised as 'generating units' or 'loads'. The can only be data providers.	On distribution systems: In lines 4027 et seq we explain that "the GLDPM encompasses all injections ("generation") into and withdrawals ("load") from the transmission system." Distribution systems are therefore clearly within scope of the GLDPM, so we will not incorporate your comment On NEMOs / brokers: We will remove references to these from the GLDPM because it would be legally difficult to justify doing so (even though it would be rather efficient in some respects), so we shall be implementing your suggestion	Make it clear that NEMOs / brokers are out of scope of the GLDPM and are not required to provide data under the GLDPM
4221_A	SSE , EURELECTRIC	It would be extremely helpful to the reader if the reference here to 'significant grid user' could be linked directly to the term SGU as used in all the other Guidelines and Network Codes. This could be done by including here a simple table of every other Guideline and Network Code, whether it has SGUs (and if so listing them) and whether the primary data owner or another party (such as a DSO for Type A generators under the RFG and TSOG) is responsible for either (i) structural data and / or (ii) variable data. Such a simple 'look-up' table will enable all stakeholders (from the smallest domestic consumer to the largest power station in the Union) to know what is expected of them in terms of this methodology.	We think that your suggestion of summarising all data provision requirements in a look-up table is very helpful. However, the revised GLDPM shall no longer build on the concept of "significant grid user", so it would not make sense for us to introduce such table in the GLDPM.	
4223_A	P2 Analysis: Energy Networks Association; EURELECTRIC	It is not possible to inject and withdraw at the same time. There is always a single instantaneous net flow. It is therefore not at all clear what point this text is trying to make.	In the case of a meshed distribution system it is very well possible for the distribution system to be feeding into the transmission grid at one node and to be withdrawing from the transmission grid at another node. The point of introducing the "hybrid" group is to be able to cover all generation units and loads (as defined in the GLDPM). We note, for the sake of completeness, that we will not therefore modify the methodology in light of your comment.	
4231_A	EURELECTRIC , Danish Energy Association	[Concerns lines 4231 to 4236] The DSO is assigned to provide data from Typa A generating modules. Since the CGM is foreseen for voltage levels at 220 kV and above, the possibility of TSOs providing aggregated data with respect to generation and load data should be included in the methodology	Detailed coverage of the 220 kV (and above) level is a minimum requirement; the legal requirement is for IGMs to "cover all network elements of the transmission system that are used in regional operational security analysis for the concerned time-frame." We assume that your comment contains a typo and is meant to be referring to "the possibility of DSOs providing aggregated data". The GLDPM cannot and should not try to determine what the appropriate resolution is for each of the control areas, so we do not want to write that it is sufficient to provide aggregate data. However, we will include for TSOs the obligation to request as little detail as is sufficient for them to build their IGMs etc. We trust that that adequately addresses the point made in your comment. Please see the note referred to on the right for an outline of the revised GLDPM.	See note with filename "principles_for_revision_of_GLDPM"

4247_A	EURELECTRIC / Danish Energy Association	[Concerns lines 4247 to 4251] Since the CGM is foreseen for voltage levels at 220 kV and above, the possibility of TSOs providing aggregated data with respect to generation and load forecasts should be included in the methodology.	Please refer to the answer to comment 4231_A	
4249_A	Finnish Energy / Swedenergy	A list of required data should be given in order to be able to comment. F. ex. It is stated that generation forecasts from type A generators are needed. In the current balance settlement nor in the future Nordic Balance settlement model (starting 10/2016) these are not needed from generators aggregated in consumption balance (upto 1 MVA). This should remain the case in the future also.	Your comment aims at an explicit list of data to be provided. This would increase the clarity of the GLDPM so we shall provide an explicit maximum list in the revised GLDPM. As for different TSOs' specific data requirements, TSOs shall determine these based on the GLDPM as the maximum list. If the Nordic TSOs do not require the data your comment mentions, then they shall not ask for these. Please remember that we are putting 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 taking into account your comment by revising the GLDPM based on the outline referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4249_B	P2 Analysis: Energy Networks Association: EURELECTRIC	It is not necessary or appropriate for DSOs to provide the forecasts. DSOs are providing the standing data. TSOs are well versed, or even the acknowledged experts, in forecasting all types of generation output, including for RES, for their purposes. It makes no sense to transfer this responsibility to DSOs.	Your comment proposes a more efficient division of labour between TSOs and DSOs, so in the revised GLDPM we will assign the responsibility for generation forecasts for PGMs that are modelled as aggregates to TSOs.	The GLDPM shall assign the responsibility for preparing generation forecasts for power generating modules that are modelled as aggregates to TSOs.
4264_A	SSE : EURELECTRIC	The use of data already provided by parties to either NEMOs or brokers is a welcomed inclusion. This avoids duplication of data which might otherwise, inadvertently, lead to 'double counting'.	Thank you for the endorsement! However, we will unfortunately have to remove NEMOs and brokers from the GLDPM for legal reasons. For the sake of completeness we note that this means that we shall have to revise the GLDPM in a way that goes against the spirit of your comment.	
4301_A	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	To avoid duplication of communication channels and unnecessary reporting burdens on generators, available data should be transferred between (distribution and transmission) system operators.	Thank you for the reminder which increases the clarity of the document and which we shall therefore implement in the following way: We shall append to the section on confidentiality the clarification that the confidentiality clause is without prejudice to the data-sharing provisions in, for example, the SOGL.	Append to the section on confidentiality the clarification that the confidentiality clause is without prejudice to the data-sharing provisions in, for example, the SOGL.
4327_A	EDF	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.	Please refer to the answer to comment 1507_A	
4327_B	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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". [FNT: 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)] 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.	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. 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 those data that it needs in order to meet its legal obligations. Each TSO shall carefully determine which data it needs.	See note with filename "principles_for_revision_of_GLDPM"
4353_A	SSE : EURELECTRIC	[type] "describes the relationship"	Thank you: correction made!	
4355_A	SSE : EURELECTRIC	[type] "hypothesis of a desired accuracy"	Thank you: correction made!	
4356_A	SSE : EURELECTRIC	[type] "common grid model" as a defined term should be in bold.	Thank you: correction made!	
4380_A	EURELECTRIC	with respect to the definition "ahead" it's not clear whether the "-1" data is planned data or measured data	Data should be such that, as required by Regulation 2015/1222 Article 28 (2), "the most reliable set of estimations practicable" is provided. This methodology is all about planned / forecast and not measured data. Given that with respect to the future only planned or forecast data can be provided, we do not think it necessary to clarify that point in the GLDPM.	
4383_A	EURELECTRIC	with respect to the definition "ahead" it's not clear whether the "-1" data is planned data or measured data	Please refer to the answer to comment 4380_A	
4388_A	SSE : EURELECTRIC	The comments above under 3929, 4125 and 4133 apply here with respect to TSOs "...will be setting their own, local deadlines for data providers".	Please refer to the answer to comment 3929_A and the outline referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4397_A	EURELECTRIC	unclear delivery time due to definition "ahead"	We will set default delivery deadlines for data providers for all data to be provided to TSOs in the revised GLDPM. This ensures the clarity of the methodology and addresses your comment. Please see the outline referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4406_A	EURELECTRIC	Y-1, D-2, D-1 to be defined more clearly	The following clarifications were added in the "comments" column of the corresponding table: Y-1: IGM being prepared for scenario(s) that refers (refer) to the calendar year following the one during which the IGM is being prepared D-2: IGM being prepared for scenario(s) that refers (refer) to the day two days after the day on which the IGM is being prepared D-1: IGM being prepared for scenario(s) that refers (refer) to the day after the day on which the IGM is being prepared We implemented these comments because they improve the clarity of the document.	Changes required already implemented in master
4410_A	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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, Thevenin 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.	Thank you for this comment which we read as suggesting that TSOs should not ask for more data than they need. Since that is a reasonable principle which should reduce costs for data providers, we shall revise the GLDPM in line with the outline referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4433_A	EURELECTRIC	It's not clear how data is handled if also type B generators 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 SOGL and is out of scope of the CGMM / 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 CGMM / 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.

4433_B	Finnish Energy: Swedenergy	What are the choices of "primary energy source"? Needs to be in line with the way data is collected at national level.	Thank you for this observation. The main types of "primary energy source" should be the same across all national jurisdictions covered by the GLDPM in that all of these should be based on or compatible with the EMFIP classification, so we are confident that if everyone uses their national classification of "primary energy sources" it should be possible to use the resulting data sets for building IGMs / CGMs (potential minor discrepancies in definitions notwithstanding). Therefore we shall not revise the methodology in light of your comment.	
4442_A	Finnish Energy: Swedenergy	Who determines the necessity of the data if TSO and DSO don't agree? The right to demand <u>any additional</u> data is too extensive. There needs to be a balance of what data is actually needed and what is realistic to get with reasonable efforts and costs.	We agree that TSO discretion shall be circumscribed and we will revise the GLDPM accordingly. The GLDPM shall constitute a maximum list from which each TSO shall request only what it needs. We also agree that there should be a referee in case of disputes. Since your comments aim at improving the clarity of the methodology and ensuring that the burden for data providers is kept reasonable, we shall incorporate them into the GLDPM by revising the methodology based on the outline referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4451_A	SSE: EURELECTRIC	"...is replaced by". As per the comments above under 3929, 4125 and 4133 I am not certain that under the Meroni Doctrine it is legally permissible to 'replace' a deadline set in a Guideline.	Please refer to the answer to comment 3929_A	
4460_A	Finnish Energy: Swedenergy	applicable reference topology - Unclear what is meant by this and what the data would be needed for.	"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 IGM. In order to improve the clarity of the methodology we shall incorporate your comment by explaining the term "applicable reference topology" as the expected configuration of the corresponding distribution grid.	Explain the term "applicable reference topology" as the expected configuration of the corresponding distribution grid.
4461_A	Finnish Energy: Swedenergy	Planned working interruptions or outages due to faults? Needs clarification. Relevant needs to be defined (kW or other?)	The type of outage is irrelevant; all outages of "relevant DSO assets" have to be signaled to the TSO. For that reason we shall not revise the GLDPM in the light of that part of your comment. As for how "relevant DSO assets" are defined, the criterion is the one formulated in Regulation 2015/1222 Article 19 (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 19 (3) explicitly as this will improve the clarity of the methodologies.	Explain the criterion formulated in Regulation 2015/1222 Article 19 (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."
4462_A	Finnish Energy: Swedenergy	Settings 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	This data item refers to the voltage set-point for the transformer: more specifically, the targeted 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 filename "principles_for_revision_of_GLDPM"
4462_B	P2 Analysis: Energy Networks Association: EURELECTRIC	Tap positions will not always be available. Add "where available" to the text	Please refer to the answer to comment 4462_A	
4463_A	Finnish Energy: Swedenergy	Why is this information needed if reactive power requirements need to be met in connection point?	Our methodology does not formulate reactive power requirements. The information on the expected use of reactors and capacitors is required for the proper modeling of the grid. As this is generally the case for all data described in the GLDPM we shall not be revising the document in light of your comment.	
4464_A	Danish Energy Association: EURELECTRIC	01 of 03 [Concerns lines 4464 to 4469] We see several issues within the GLDPM, p. 39, line 4464 - 4469, where DSOs are made responsible for providing day-to-day prognosis, per market time unit (15 min. resolution), of consumption and production on a nodal level (interpreted as at every 132/50 kV, 132/30 kV and 132/10 kV station). This will be an extensive and completely new task for the DSOs in Denmark, which is carried out by the Danish TSO today.	Please refer to the answer to comment 4249_B	
4464_B	EURELECTRIC	02 of 03 (concerns lines 4464 to 4469) Centralizing the task of making the prognosis at the TSO (as is today) holds great advantages, 1) as the prognosis hereby are made from the same uniform methodology, data-structure, IT format etc.. 2) as it is much easier to pose demands on the quality of the prognosis 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 an hourly resolution In regard to the societal value, should DSO's, by these new rules, be forced to make these day-to-day prognosis. 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 4249_B	
4464_C	Danish Energy Association	02 of 03 [Concerns lines 4464 to 4469] Centralizing the task of making the prognosis at the TSO (as is today) holds great advantages, 1) as the prognosis hereby are made from the same uniform methodology, data-structure, IT format etc.. 2) as it is much easier to pose demands on the quality of the prognosis if it is placed at one entity, than on 60 separate DSOs (as 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 an hourly resolution, via their "DataHub", by 2020. In regard to the societal value, should the Danish DSO's, by these new rules, be forced to make these day-to-day prognosis, probably 2-3 men would be occupied at each DSO = 120-180 men. Placing the task at the TSO (as it is today) only 3-5 men 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 4249_B	
4464_D	EURELECTRIC	03 of 03 (concerns lines 4464 to 4469) 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 legally demand that the DSOs takes over the task of making these comprehensive prognosis - despite the fact that it is socio-economic in-effective.	Please refer to the answer to comment 4249_B	
4464_E	Danish Energy Association	03 of 03 [Concerns lines 4464 to 4469] 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 legally demand that the DSOs (including our selves) takes over the task of making these comprehensive prognosis - despite the fact that it is socio-economic in-effective.	Please refer to the answer to comment 4249_B	
4465_A	EURELECTRIC	It's not clear how data is handled if also type B generators are connected to the DSO: will there be a data exchange between TSO and DSO in both directions?	Please refer to the answer to comment 4433_A	
4465_B	P2 Analysis: Energy Networks Association: EURELECTRIC	The TSO is in just as good a position to provide this forecast. There is no merit in forcing the DSO to attempt it.	Please refer to the answer to comment 4249_B	

4465_C	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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.	Please refer to the answer to comment 4249_B	
4466_A	Finnish Energy: Swedenergy	Production forecasts not required in the new Nordic Balance Settlement model from generators aggregated in consumption balance. This should remain the case in CGM also.	Please refer to the answer to comment 4249_B	
4483_A	EURELECTRIC	(same comment is made with respect to line 4500 and 4523) how should data be provided if the generation module is multi-fuel and the primary energy source changes e.g. by market price reasons	Please refer to the corresponding guidance in EMFIP documentation where this point is addressed. For the sake of completeness we note that we shall not be revising the GLDPM in light of your comment. The FAQ document available at https://www.entsoe.eu/Documents/MC%20documents/Transparency%20Platform/Transparency_platform_FAQ.pdf addresses the same question on p. 16 ("dual" fuel unit)	
4484_A	EURELECTRIC	how is cold and warm start defined, especially with respect to temporarily mothballed units?	The interest of the CGMM in these pieces 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 mothballed 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 stating in the GLDPM that, where required, as part of national implementation TSOs shall also provide additional clarification of definitions etc. See outline referred to on the right.	See note with filename "principles_for_revision_of_GLDPM"
4500_A	EURELECTRIC	(same comment is made with respect to line 4483 and 4523) how should data be provided if the generation module is multi-fuel and the primary energy source changes e.g. by market price reasons	Please refer to the answer to comment 4483_A	
4521_A	Swedenergy: Energy Norway	If a power generating module is connected to the distribution grid, the data should be purely 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 CGMM / 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 CGMM / 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.	
4523_A	EURELECTRIC	(same comment is 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 market price reasons	Please refer to the answer to comment 4483_A	
4538_A	SSE	"...is replaced by". As per the comments above under 3929, 4125, 4133 and 4451 I am not certain that under the Meroni Doctrine it is legally permissible to 'replace' a deadline set in a Guideline.	Thank you for the observation. It is unfortunate that our formulation gave the misleading impression that we meant to revise the SOGL and "replace" a requirement set out therein. We just meant to say that the GLDPM fixes, in this instance, an update frequency that is different from the update frequency set out in SOGL (2015-11-27). The revised GLDPM shall be clear in this respect. Please refer to the answer to comment 3929_A too.	
4554_A	EURELECTRIC	(same comment is made with respect to line 4566) data should be taken from the EMFIP	Where data are already available via EMFIP or REMIT, data providers shall not have to provide these data directly to TSOs a second time. Instead the responsibility for obtaining these data shall be the TSO's. 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 on the right.	See note with filename "principles_for_revision_of_GLDPM"
4554_B	Finnish Energy: Swedenergy: Energy Norway:	It should be enough to report according to REMIT (or as we in Nordics call urgent market message UMM), 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	Finnish Energy: Swedenergy: Energy Norway:	It should be enough to report according to REMIT (or as we in Nordics call urgent market message UMM), 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	Finnish Energy: Swedenergy: Energy Norway:	It should be enough to report according to REMIT (or as we in Nordics call urgent market message UMM), 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	Finnish Energy: Swedenergy: Energy Norway:	If a power generating module is connected to the distribution grid, the data should be purely 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 4521_A	
4566_A	EURELECTRIC	(same comment is made with respect to line 4554) data should be taken from the EMFIP	Please refer to the answer to comment 4554_A	
4575_A	Finnish Energy: Swedenergy: Energy Norway:	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. NB: The second part of the sentence read "D-2 prognosis should in any case not seen as a binding schedule for SGUS" in the Energy Norway comment.	TSOs are well aware that the (D-2) information requested - "forecast active power output and active power reserves" - is non-binding and provides only an imperfect forecast. Nevertheless, in line with Regulation 2015/1222 Article 16 (3) (d) TSOs may still find the information helpful. Please remember that the GLDPM serves as a maximum list of data that TSOs can, but do not have to obtain if they do not need them. 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 declare their most accurate forecasts in due time so to enable TSOs to efficiently operate the electricity system. As mentioned earlier in this response and discussed at ENTSOE's public workshop on February 18th, market parties' forecasts (in particular at D-2 as mentioned in line 4575) could be consistently improved if TSOs published the following information: 1) full-extent CGMs (including variable data) for yearly, monthly, and weekly time frames; 2) forecast XB exchange capacities (both NTC and FB domain) for all short-term horizons (D-2, DA, ID) one day before these timelines or by D-3 at the latest; 3) capacity calculation methodologies; 4) linking notifications in the framework of REMIT with actually anonymous outputs of capacity calculation (e.g. CBCO or NTC).	TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Therefore we shall not modify the methodologies in the light of this 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 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. However, they are out of scope for the CGMM drafting team.	See note with filename "transparency"

4575_C	EURELECTRIC	<p>We acknowledge that market parties should declare their most accurate forecasts ahead so that system operation delivers most value for the consumers. But we should insist that market parties' forecasts (in particular in D-2 as mentioned in line 4575) would be even better if TSOs were fully transparent on:</p> <ol style="list-style-type: none"> 1) network topology (for example by publishing monthly the expected average CGM for peak and offpeak periods) 2) capacity calculation methodologies, 3) XB exchange capacities (both NTC and FB domain), to be derived from monthly CGMs and updated weekly 4) linking notifications in the framework of REMIT with actually anonymous outputs of the capacity calculation (e.g. CBCO) - otherwise they are useless <p>As market participants we believe that any data that could influence the wholesales prices should be made available to the market. During the workshop we received as feed-back that this kind of information is already published by some TSOs but not for all countries. We strongly advocate that the level of details on transparency should be further aligned among TSOs.</p> <p>Moreover, there is no obligation today to provide information in D-2 (only W-1 indicative data in some countries like France and Belgium) so this new rule will translate into a new process- and therefore new cost for utilities. Furthermore, if TSOs impose new obligations on D-2, does it mean that we still have to provide forecasts in W-1 in BE and in FR or these will fall away? We are in favour of retaining the day-ahead and intraday information exchanges but the value of data currently sent in W-4 and W-1 is considered as low.</p>	<p>TSOs have regrettably come to the conclusion that in connection with the CGM and GLDP methodologies no additional data can be released. Therefore we shall not be revising the methodologies in this respect. Please see our detailed explanation on this topic.</p> <p>As for the (D-2) data described in the GLDPM, please remember that the GLDPM serves as a maximum list of data that TSOs can, but do not have to obtain if they do not need them. Given that this is stated as a general principle (see the outline referred to on the right), we see no reason to modify the methodology in the light of this part of your comment.</p> <p>Existing national requirements with respect to data provision will not, in principle, be affected by the GLDPM. Given that this is stated as a general principle (see the outline referred to on the right), we see no reason to modify the methodology in the light of this part of your comment.</p> <p>Please refer to the answer to comment 4575_B as well.</p>	<p>See note with filename "transparency"</p> <p>See note with filename "principles_for_revision_of_GLDPM"</p>
4576_A	EURELECTRIC	<p>"Any other information that the TSO deems relevant" is very vague, the text should be more precise and gives explanation to why data is needed. This really gives a lot of freedom to TSOs to request any information from plant managers on how the plant will be dispatched. TSOs should detail the list of potential required data and their requests should be limited to the list. Any addition to this list should get NRA approval first. It is indeed very important for data providers to know and anticipate what will be expected from them</p>	<p>We agree with your suggestion which we shall take into account (by revising the GLDPM based upon the outline referred to on the right) because that reduces the burden on data providers in an appropriate manner. In the revision, we will make it clear that (i) TSOs can (but do not have to) only obtain the data explicitly stated in the GLDPM and that (ii) "relevant available information relating to how generation units will be dispatched" is limited to 1. data on forecast active power output and 2. active power reserves as well as 3. an indication if the dispatch decision is determined by non-market factors such as, for example, a fixed feed-in tariff (i.e., does not include marginal cost etc.) Furthermore, we will explicitly restate the requirement in Regulation 2015/1222 Article 16 (5) according to which the latter type of information shall only be used for "capacity calculation purposes".</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p> <p>In the GLDPM make it clear that relevant available information relating to how generation units will be dispatched is limited to 1. data on forecast active power output and 2. active power reserves as well as 3. an indication if the dispatch decision is determined by non-market factors such as, for example, a fixed feed-in tariff (i.e., does not include marginal cost etc.) Furthermore, explicitly restate the requirement in Regulation 2015/1222 Article 16 (5) according to which the latter type of information shall only be used for "capacity calculation purposes".</p>
4576_B	Finnish Energy / Swedenergy / Energy Norway	<p>"Any other information" is very vague, they should be more precise and give explanation to why data is needed.</p>	<p>Please see answer to comment 4576_A</p>	
4576_C	EDF	<p>For the avoidance of doubt, it should be also clarified that the provision of such data to the TSOs are provided for the purpose of capacity calculation and should not be used for other purposes, as foreseen by Article 15.5 of CACM Regulation</p>	<p>Please see answer to comment 4576_A</p>	
4577_A	EURELECTRIC	<p>(concerns lines 4577 to 4578) (the comments had slight differences in wording; the EURELECTRIC version was retained as this was the most extensive one) "For example, power generating facility owners might be asked to indicate whether their power generating facility will be dispatched as a function of the spot market price"</p> <p>It should be deleted: "For example, power generating facility owners might be asked to indicate whether their power generating facility will be dispatched as a function of the spot market price" This should not be something TSOs should even consider asking. They are market participants as well and they should</p>	<p>Please see answer to comment 4576_A</p>	
4578_A	EURELECTRIC	<p>(concerns lines 4578 to 4579) "....might also be asked to provide an indicative estimate of marginal cost".</p> <p>It should be deleted: "....might also be asked to provide an indicative estimate of marginal cost"</p> <p>We are uncertain of the benefits of this data for the TSOs given that the various items that make up any indicative estimate of costs will change over time and could include cost items (such as system balancing costs) that are within the control / knowledge of other parties, such as the TSO, rather than the power generating facility owner. Furthermore, this is highly business confidential information. TSOs should assume that a unit is dispatched as a function of the market price for electricity and for the input fuel. If they want to make assumptions about marginal cost they can find the market price for gas and coal to make their assumptions on marginal cost. Notwithstanding that, if this wording is to remain then it should also apply to interconnectors</p>	<p>Please see answer to comment 4576_A</p>	
4578_B	SSE	<p>"....might also be asked to provide an indicative estimate of marginal cost". As per the point I raised at the February 2016 workshop I'm not certain of the benefits of this data for the TSOs given that the various items that make up any indicative estimate of costs will change over time and could include cost items (such as system balancing costs) that are within the control / knowledge of other parties, such as the TSO, rather than the power generating facility owner. Notwithstanding that, if this wording is to remain then it should also apply to interconnectors.</p>	<p>Please see answer to comment 4576_A</p>	
4578_C	Finnish Energy / Swedenergy / Energy Norway	<p>(the comments were worded slightly differently; the Finnish Energy / Swedenergy version was retained) This should not be something TSOs should even consider asking. They are market participants as well and they should not gather business logics from other market parties</p>	<p>Please see answer to comment 4576_A</p>	
4579_A	Finnish Energy / Swedenergy / Energy Norway	<p>(the comments were worded slightly differently; the Finnish Energy / Swedenergy version was retained) Marginal cost? Seriously? This is highly business confidential information and they should not even dare ask it. TSOs should assume that a unit is dispatched as a function of the market price for electricity and for the input fuel. If they want to make assumptions about marginal cost they can find the market price for gas and coal to make their assumptions on marginal cost</p>	<p>Please see answer to comment 4576_A</p>	
4583_A	EURELECTRIC	<p>It should be enough to report according to REMIT. We should avoid double reporting of same things to ACER and to ENTSO-E and to the Markets</p>	<p>Please refer to the answer to comment 4554_A</p>	

4583_B	Finnish Energy: Swedenergy: Energy Norway:	Why not use same data as is used in UMM (see comment to lines 4554-4556).	Please refer to the answer to comment 4554_A	
4584_A	EURELECTRIC	It should be enough to report according to REMIT. We 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	
4584_B	Finnish Energy: Swedenergy: Energy Norway:	Why not use same data as is used in UMM (see comment to lines 4554-4556).	Please refer to the answer to comment 4554_A	
4589_A	Moyle Interconnector Ltd.	<p>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 owned by certified TSOs. Data from interconnectors that are owned by certified TSOs will be included in the Common Grid Model via inclusion in an Individual Grid Model, in line with the CACM GL obligations on all certified TSOs.</p> <p>We therefore suggest that the section should be titled:</p> <p>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</p>	<p>Thank you for the suggestion which we shall implement because it improves the clarity of the document (although we may not use the exact formulation that you propose). We shall at any rate clarify the following: Interconnectors operated by certified TSOs are out of scope of the GLDPM and are not required to provide data under the GLDPM where the responsibility for complying with the corresponding obligations has been assigned to another TSO pursuant to Article 1 (3) of Regulation 2015/1222. Also note that all TSOs are free to delegate tasks assigned to them by Regulation 2015/1222 in accordance with Article 81 of the Regulation.</p>	<p>Revise corresponding section title to 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" or use an equivalent formulation that clarifies the following: Interconnectors operated by certified TSOs are out of scope of the GLDPM and are not required to provide data under the GLDPM where the responsibility for complying with the corresponding obligations has been assigned to another TSO pursuant to Article 1 (3) of Regulation 2015/1222. Also note that all TSOs are free to delegate tasks assigned to them by Regulation 2015/1222 in accordance with Article 81 of the Regulation.</p>
4635_A	IFIEC	<p>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.</p>	<p>The SOGL provisions themselves are out of scope in the sense that we cannot modify these. However, in line with your comment, 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.</p> <p>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.</p> <p>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 that reason the GLDPM 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 "newly" covered by the GLDPM whose data the TSO requires time to make the necessary preparations.</p> <p>As for those demand facilities that are truly "small" and whose market participation is intermediated by an aggregator, the GLDPM shall formulate obligations as obligations for the aggregator. This shall make it clear that no unreasonable requirements are formulated with respect to such "small" demand facilities.</p> <p>Note that real-time data are completely out of scope of the GLDPM; the GLDPM is not asking for these.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p> <p>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.</p> <p>As for those demand facilities that are truly "small" and whose market participation is intermediated by an aggregator, the GLDPM shall formulate obligations as obligations for the aggregator. This shall make it clear that no unreasonable requirements are formulated with respect to such "small" demand facilities.</p>
4650_A	SSE: P2 Analysis: Energy Networks Association: EURELECTRIC	<p>The Transmission System Operation Guideline has been drafted (and will be approved) on the basis that structural data will be provided for transmission connected demand facilities. The proposed wording here ("Relevant demand facilities (as defined in section 1.7) shall also provide these data.") could be seen as an attempt to circumvent what is in the TSOG 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 TSOG accordingly.</p>	<p>Please see answer to comment 4635_A, too</p> <p>Our aim in basing the GLDPM on the SOGL 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 tailor the contents of the GLDPM to the requirements of building the CGM in a more bespoke manner. The SOGL and the GLDPM 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 SOGL. For the sake of completeness we note that in the light of our explanations we see no need to modify the GLDPM. However, the principles based on which we shall revise the GLDPM (cf. outline referred to on the right) should go some way towards addressing your concerns.</p>	<p>See note with filename "principles_for_revision_of_GLDPM"</p>
4653_A	Finnish Energy: Swedenergy: Energy Norway:	4653 to 4671. Same comments as to lines 4575-4579, when applicable.	See answers given to comments in lines 4575-4579 where applicable	
4663_A	SSE	It should be made clear that an schedule would only be provided (for distribution connected demand facilities of a domestic size) via an aggregator as it is impractical for this to be provided by individual consumers.	Please see answer to comment 4635_A	
4663_B	SSE	It should be made clear that power will only be curtailed if paid for. Amend this line to read: "...minimum and maximum power paid to be curtailed..."; and"	<p>The quote that the comment is referring to is taken from the SOGL (which is out of scope for us). 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) DSM arrangements. We have therefore revised the draft to read as follows:</p> <p>"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 (market) arrangements;"</p> <p>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 GLDPM on the SOGL as much as possible) is removed as part of the revision.</p>	
4664_A	IFIEC	<p>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 non-remunerated in most cases)</p>	Please see answer to comment 4663_B	

4669_A	SSE: EURELECTRIC	If the definition of relevant demand facility extends to smaller consumers how will "...the obligation for outage planning agents to provide availability plans" be achieved practically?	Please see answer to comment 4635_A It appears extremely unlikely that "small" demand facilities would, on their own, become "relevant" in the sense in which that term is used in the passage that the comment refers to. At most it seems conceivable that an aggregator might become relevant and we would indeed expect an aggregator to know which of the demand facilities it aggregates are out of service / planning to be out of service. In the light of these explanations we do not think it necessary to revise the methodologies in light of the comment.	
4671_A	Finnish Energy ; Swedenergy ; Energy Norway ;	Same comments as to lines 4575-4579, when applicable.	See answers given to comments in lines 4575-4579 where applicable	
4702_A	SSE: EURELECTRIC	(NB: The wording of the two comments was not completely identical.) It should be made very clear that the obligations in the methodology with respect to Chapter 4 - data quality assurance – also apply to the TSOs. For example, in the context of line 4717, the RCSP should be able to 'sanction' the TSO in respect of insufficient data quality. In the current proposal there is no mention on what are the penalties foreseen, if any, in case of poor quality of the information provided by TSOs.	TSOs' 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 shall take into account because it ensures a more appropriate balance of responsibilities. We will clarify TSOs' obligations in this respect and we will include proposals for quality monitoring as far as TSOs are concerned (most likely in the CGMM rather than in the GLDPM). As far as "sanctions" and "penalties" are concerned, we will delete that proposal and instead require NRAs to enforce the obligations set out in the methodologies (i.e., enforce them against everyone concerned - data providers, TSOs, etc). Please see the outline referred to on the right, too.	See note with filename "principles_for_revision_of_GLDPM" Include proposals for quality monitoring as far as TSOs are concerned in the CGMM
4713_A	SSE: EURELECTRIC	(NB: The wording of the two comments was not completely identical.) In accordance with Article 6(5) of the TSOG, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO. Amend this line 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 SOGL (2015-11-27) Article 6 (5) is applicable in that that article addresses the JOINT decision of ALL NRAs. However, we do not disagree with the spirit of your comment. While the exact formulation to be used in the revised GLDPM will not be known for some time, we agree that implementation shall be according to national rules which will in many cases entail the consultation of stakeholders and at least a referee role for the NRA. For rules (on things such as file formats etc) that are of purely local / national relevance, it does not strike us as appropriate to suggest an alternative to the procedures already in place. Please see the outline referred to on the right but addresses these principles.	See note with filename "principles_for_revision_of_GLDPM"
4715_A	EDF	Section 8 of the consultation document mentions that RSCs are responsible for the quality check of IGMs and CGMs. In our view, the indicators proposed in Sections 8.2 and 8.3 are more related with "consistency" of the IGMs and CGMs than with the "accuracy" of forecasts 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 IGMs, 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 IGMs and CGMs. These indicators could then be periodically disclosed and commented, enabling all interested parties to improve their own approaches.	Please refer to the answer to comment 3379_A	
4717_A	EURELECTRIC	"TSO shall have the right to sanction insufficient data quality in an appropriate manner" It should be deleted: " TSOs shall have right to sanction insufficient an appropriate manner " The way the data quality assurance is described in the current proposal is not appropriated. This goes far beyond the powers given to TSOs in the framework of the CACM guideline and therefore, it should be deleted. We agree that market parties should make their best effort to declare the most accurate forecasts, but they cannot be held responsible for insufficient results. What is insufficient data quality, when we are talking about "estimations"? The national legal framework already foresees the potential infringements and actions related taken by competent authorities. 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 REMIT obligations. If TSOs want to ensure the quality of the data provided by network users there should be an obligation of means rather than an obligation of result. If maintained, details are required here of (1) what the 'sanctions' are, (2) what are the criteria and (3) how a party that has been sanctioned by the TSO can appeal that sanction to the NRA. It is against natural justice that a TSO can unilaterally punish another party in terms of data quality without that party having a right to appeal that TSO imposed sanction to an independent third party.	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 master, no additional to-dos
4717_B	SSE	As per the point I 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 against natural justice that a TSO can unilaterally punish another party in terms of data quality without that party having a right to appeal that TSO imposed sanction to an independent third party.	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-dos
4717_C	P2 Analysis; Energy Networks Association	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 against natural justice that a TSO can unilaterally punish another party in terms of data quality without that party having a right to appeal that TSO imposed sanction to an independent third party. Furthermore, this goes far beyond the powers given to TSOs in the framework of the CACM guideline. We agree that market parties should make their best effort to declare the most accurate forecasts, but they cannot be held responsible for insufficient results. 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 REMIT 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-dos
4717_D	EDF	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 document 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. The approach proposed in the draft Guideline SO (Article 70.6) 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 CACM.	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-dos
4717_E	Finnish Energy	TSOs shouldn't be allowed to set sanctions for insufficient data quality. There are already processes to sanctioning wrong data (REMIT). No additional legislation is needed. If parties are not following set rules, the processing should be applied via existing procedures (e.g. in Finland via NRA).	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-dos

4717_F	Swedenergy, Energy Norway	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 REMIT 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-dos
4717_G	IFIEC	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.	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-dos
4717_H	EDF	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 of the 2016-02-23 version, not the 2015-11-27 version) [FN1: « 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"] 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.	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-dos
4717_I	CEDEC / EDSO for Smart Grids / EURELECTRIC / GEODE	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". (...) 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.	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-dos
4720_A	EURELECTRIC	"As for the TSOs themselves, as was noted in section 1.5 there is a simple criterion that they have to meet: their IGMs have to pass the quality checks required before the models can be made available via the OPDE" A minimum of reporting about these quality checks, with appropriate justifications and explanations, shall be envisaged in the NRA's approval of the GLDPM/IGM/CGM. Moreover, insufficient data quality from the TSOs side shall be assessed and properly considered in the process. The national legal framework already foresees the potential infringements and actions related taken by competent authorities in that sense, in the same manner as "insufficient data quality" from the side of generation units and loads.	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 CGMM rather than in the GLDPM) in order to take the comment into account. Please refer to the answer to comment 3379_A, too.	
4726_A	EDF	The general implementation timescale presented during the ENTSO-E workshop of February 18th should be included for the sake of transparency in section 5 of the draft methodology. Furthermore, if NRAs require some amendments of 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 slides - there was only one slide on the topic of the timescale for implementation which provided a very general overview. Since the timescale will be revised we shall not be taking into account that comment in the methodology. As for keeping stakeholders informed about the process, we agree with your suggestion. At the moment the priority is, of course, to deliver the methodologies by the deadline. However, immediately thereafter we shall turn our attention to implementation issues (see lines 4742 et seq). While we will, of course, keep interested parties updated via the ENTSO-E website etc, it will likely be necessary for each individual TSO to inform its stakeholders (in the context of the GLDPM that notably includes data providers: cf. lines 4742 et seq) about the methodologies and, if and when applicable, any changes to the requirements demanded by NRAs. Of course, TSOs shall not assume that the methodologies will be approved without amendments and they shall make it clear to stakeholders (in particular data providers) that the methodologies 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 GLDPM has been approved. Many thanks for the thoughtful reminder. For the sake of completeness we note that the comment does not require changes to the methodologies.	Keep interested parties updated via the ENTSO-E website etc Each individual TSO to inform its stakeholders (in the context of the GLDPM that notably includes data providers) about the methodologies and, if and when applicable, any changes to the requirements demanded by NRAs. TSOs shall not assume that the methodologies will be approved without amendments and they shall make it clear to stakeholders (in particular data providers) that the methodologies 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 GLDPM has been approved.
4729_A	SSE; EURELECTRIC	Given the statement in 4742 (that TSOs will commence implementation once the methodology is submitted for approval) consideration should be given to what will happen if "a request for amendments" is submitted.	Please see answer to comment 4726_A	
4749_A	SSE; EURELECTRIC	As per the comments under 4713, and in accordance with Article 6(5) of the TSOG, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO. (NB: For simplicity, the comments referred to are restated below.) In accordance with Article 6(5) of the TSOG, the National Regulatory Authorities should be involved in approving the implementation rules specified by the TSO. Amend this line 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	Please see answer to comment 4713_A	
4755_A	SSE; EURELECTRIC	(NB: The wording of the two comments was not completely identical.) As per the comments under 4221, 4650 and 4669 it is vital that all parties large and small across the Union clearly understand if they (or someone else) will be responsible according to this methodology for providing (1) the structural data and (2) the variable data for their facility	Your comment aims at a very important objective, so we shall take it into account by writing the GLDPM in a clear manner. As part of the GLDPM or as a separate document we shall provide a table with all data, who is required to provide them etc.	As part of the GLDPM or as a separate document provide a table with all data, who is required to provide them etc.
4785_A	EDF	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. As mentioned during the workshop organized by ENTSOE on February 18th, these obligations will impose additional operational burdens on SGUs at their own expenses, whereas forecasts could be provided by TSOs, which are likely elaborate them in any case. The granularity and frequency of information required to SGUs raise the issue of a trade-off between the costs imposed on market parties and the costs incurred by TSOs. EDF believes that it is up to NRAs to solve this trade off, while taking into account the principle of article 4(2)(c) of GL SO requiring to: "apply the principle of optimisation between the highest overall efficiency and lowest total costs for all parties involved". Thus we expect a proposal of the list of entities required to provide information to the TSOs (for each type of data) accompanied by a cost benefit analysis justifying the envisaged solutions.	Please refer to the answer to comment 1507_A	

4785_B	EDF	(identical comment relating to line 4090) 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.	Please see answer to comment 4090_A	
4816_A	SSE: EURELECTRIC	The inclusion of the two annexes for information / illustrative purposes is very helpful to the reader of the methodology.	Thank you for the encouraging remark! We shall retain the annexes for information purposes although the provisions on participation in the CGM process shall become somewhat more formal. We note for the sake of completeness that your comment does not require any changes to the documents.	
4842_15	Moyle Interconnector Ltd.	(concerns sub-line 15) The name of Moyle Interconnector Ltd should be corrected in synchronous area GB (sub-line 15). We suggest: Moyle #6 Interconnector Ltd IENTSO-E member: no!	Thank you for the suggestion which we shall implement because it improves the quality of the document	Changes to master already made
4842_19	Moyle Interconnector Ltd.	(concerns sub-line 19) The Moyle Interconnector (owned by a certified TSO) is included in synchronous area GB (sub-line 15), but should also be included in synchronous area IE/NL (sub-line 19). We suggest: 19 - IE / NL - IE/NL - EirGrid plc, System Operator for Northern Ireland Ltd, Moyle Interconnector Ltd. - Yes - No	Thank you for the suggestion which we shall implement because it improves the quality of the document	Changes to master already made
9999_A	Danish Energy Association: EURELECTRIC	(Commentator(s) originally did not assign any particular line number; line number was assigned by the drafting team.) As the CGMM suggests new costly tasks, for the DSO (and other actors) within the electricity industry, we miss a general documentation 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	Danish Energy Association	(Commentator(s) originally did not assign any particular line number; line number was assigned by the drafting team.) As the GLDPM suggests new costly tasks, for the DSO (and other actors) within the electricity industry, we miss a general documentation 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	Finnish Energy	(Commentator(s) originally did not assign any particular line number; line 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 referee role for the NRA. For rules (on things such as file formats etc) that are of purely local / national relevance, it does not strike us 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 basing the revised version on the outline referred to on the right. That outline concentrates on the GLDPM, but the principles formulated with respect to implementation could also be incorporated into the CGMM.	See note note with filename "principles_for_revision_of_GLDPM"

9999_D	OST	<p>(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 IGMs(CGMs). Please see below. As its mentioned in CGM document, IGMs are the principal buildings blocks of CGMs, so their quality define then the quality of the CGMs, quality that is very important because of the purpose that CGMs are used, that is:</p> <ol style="list-style-type: none"> 1. Capacity calculation 2. Operational security analysis 3. Outage planning <p>So the the importance of the CGM(their quality) its well known. In CGM document it is stated that "all TSOs create IGMs 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".</p> <p>But I have observed in some TSOs IGMs(most DACF files) that some value are unrealistic. For example the voltage in some nodes does not represent the real situation of that network in that time. Ok, it has been within limits, but those value are much greater or lower compare to the real situation(e.g. forecasted voltage 390kV, real voltage 420-430kV). So, how could we expect reliable results then for Security Analysis, Capacity Calculation and Outage Planning?</p> <p>In this case two are the possibilities that lead to those unreal value. First one is related with the network modeling, so maybe something in the model its not modeled in the correct way(Ifd factor, tap changer of TR, etc.) and second one is related with total load of the system(import/export+Generation).</p> <p>So if we suppose that network is modeled in the correct way(maybe each RSCI can check every TSO model if they are modeled correctly) then its needed to compare at least every day the forecasted generation with the real one for each country (seeing that comparing the forecasted voltage node with the real one looks very difficult or maybe impossible)since Its a big factor that influence on voltage level and then in the flow over lines(the same that is done with the sum of total export/import in QAS portal) and make aware each TSO in QAS portal that look you have big discrepancies, please try to solve this issue, so they could make a better forecast in the future.</p>	Please refer to the answer to comment 4702_A	
9999_E	Danish Energy Association: EURELECTRIC	<p>(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 seeking to increase the international market-capacity between the European countries, without lowering the security of supply level.</p>	Thank you for the encouraging comment. For the sake of completeness we note that it does not suggest changes to the methodologies.	
9999_F	Danish Energy Association: EURELECTRIC	<p>(Commentator(s) originally did not assign any particular line number; line number was assigned by the drafting team.) In regard of jurisdictions we suggest that it is explicitly written and highlighted in the beginning of 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.</p> <p>As described in GL SO (2015-11-27) article 4: "When applying this 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..."</p> <p>This is a sound principle and should be emphasized in the CCGM and GLPDM.</p>	Please refer to the answer to comment 9999_C	
9999_G	Danish Energy Association: EURELECTRIC	<p>(Commentator(s) originally did not assign any particular line number; line number was assigned by the drafting team.) On the cost 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.</p> <p>As described in GL SO (2015-11-27) article 9 - Recovery of cost: 1. The costs borne by system operators subject to network tariff regulation and stemming from the obligations laid down in this Regulation shall be assessed by the relevant regulatory authorities. Costs assessed as reasonable, efficient and proportionate they shall be recovered through network tariffs or other appropriate mechanisms.</p>	We are happy to confirm that we will follow your suggestion by submitting the methodologies to NRAs and ACER for approval. We note for the sake of completeness that your comment does not require any modification of the documents.	
9999_H	Danish Energy Association: EURELECTRIC	<p>(Commentator(s) originally did not assign any particular line number; line number was assigned by the drafting team.) The CGMM refers on numerous places to requirements in GL SO (2015-11-27). This guideline is still under revision by x-boarder committee. Hence the content of the CCGM in consultation is undefined. The consultation of CGMM is therefore premature and should be postponed or repeated when the final wording 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 fixed.</p>	We can confirm that the methodologies will be revised in the light of the future Commission Regulation (EU) .../... of XXX establishing a guideline on forward capacity allocation (FCAGL) (in the case of the CGMM and the GLDPM) and the future Commission Regulation (EU) .../... of XXX establishing a guideline on transmission system operation (SOGI) (in the case of the CGMM) and that in each case a public consultation will be organised in line with the legal requirements set out in these two items of legislation. We note for the sake of completeness that your comment does not request 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

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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.

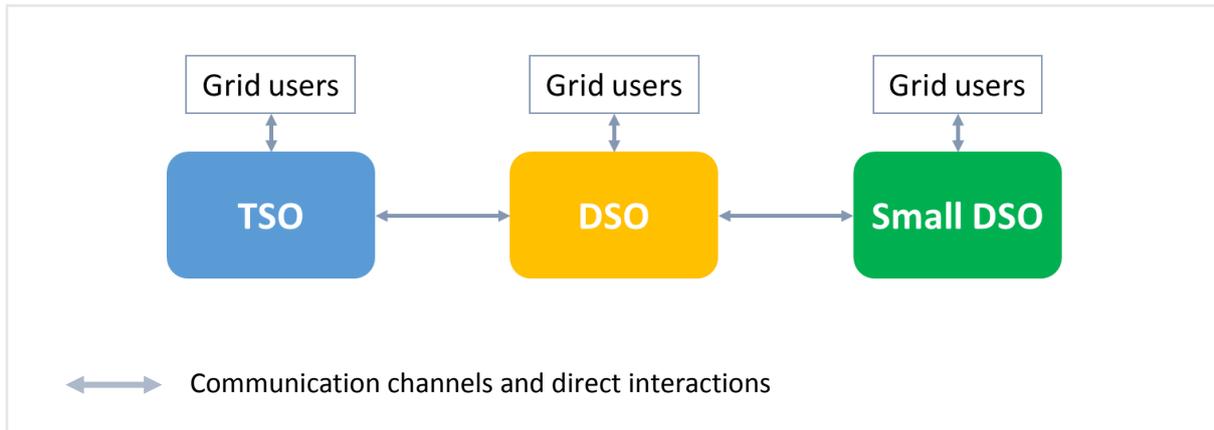
These system operators need data from grid users to operate their networks safely and efficiently manage RES. As distributed resources have greater effect on distribution than on transmission systems, DSOs need all necessary data from those generators. To avoid duplication of communication channels and 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.