Response to Consultation Comments (RtCC): GLDPM-v2

The present file constitutes the RtCC for the public consultation on the Generation and Load Data Provision Methodology pursuant to Article 17 of Regulation 2016/1719 (GLDPM-v2) from 06 March until 06 April 2017. Appended to the table with the consultation comments and the drafting team's replies are separate statements submitted as email attachments.

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
GLDPM-v2_comment_001	25	8.7		Article 8 introduces the term "aggeregator" for the first time. In 2016/1719 and 2015/1222 the term "third party" is used to describe a similar role. Consider replacing occurances of "aggregator" with "third party" if the terms both describe the same entity, or else define exactly what an aggregator is in Article 2.	By agreement with the original reviewer, the comment may be considered "resolved". However, for the sake of transparency we nevertheless publish below the most relevant passages of the email exchange with the reviewer: Drafting team reply to the reviewer: (...) many thanks for the question that you sent on the GDLPM-v2 (forwarded below). I had hoped to be able to discuss this with you during the webinar yesterday, but I think that you could not take part. On the term "aggregator" - this is used in the v1 of both the CGMM and the GLDPM already and it did not occur to us that a formal definition would be necessary or even useful. We have been asked to keep the number of additional definitions to a minimum and it seems clear enough what an aggregator is - do you see this differently? It would also be a bit tricky although not impossible to add a definition to an already-approved methodology. On the link between "aggregator" and "third party" - could you send a specific reference to one or both of the two Regulations? I have checked both of them again and did not come across any reference to an aggregator of distributed generation or demand response. The term "third party" is mentioned, but that is usually in connection with a TSO (or NEMO) delegating something. I may have overlooked the passage that you were referring to, so I would much appreciate it if you could explain this in a bit more detail. Rejoinder from reviewer: (...) I agree that the meaning of the term aggregator is	The Danish Energy Association

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					clear enough, it was in the interest of keeping the number of terms to a minimum that I questioned the need for this new term. I also agree that when 2016/1719 and 2015/1222 use the generic term "third party", they don't necessarily describe the same role as intended by an aggregator. I made the connection between "third party" and "aggregator" when reading 2016/1388 – DCC. This document uses the term/phrase "demand aggregation through a third party" (the first of several occurrences is in article 29.2), and defines 'demand aggregation' in article 2.19. It would be logical to call this third party that aggregates an "aggregator", but I suppose that the authors of the DCC had good reason not to shorten the name(?). The 2016/631-RfG has a similar phrase (occurring only once) "third parties, including aggregators". This is the background for my suggestion, but if the meaning of aggregator has never been in doubt, then using at term more consistent with the other regulations such as a "third party that aggregates" will not be an improvement.	
GLDPM-v2_comment_002	General Comment			It is very hard for DSOs to evaluate the GLDPM methodology as we for the time being do not know which parts of the distribution grid are embraced. My question at the webinar was if there is any deadline on when TSOs have to provide information about which parts of the distribution grid are embraced by the GLDPM.	By agreement with the original reviewer, the following summary of the email exchanges on the original comment / question may be considered to resolve the comment: The deadlines related to GLDPM implementation are set out in Article 18 of the GLDPM. That Article was not changed in v2 (except for an additional legal reference). A TSO wanting to obtain distribution-grid-related data based on the GLDPM was expected to inform the entities (DSOs) concerned by the relevant deadline of 11 February about the data requested. While it is obvious that updates of the	Dansk Energi

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					information required cannot be ruled out in future, the GLDPM does not have any explicit rules on when (in which intervals) the information requested may be updated. For the time being, it is expected that common sense on the part of all parties concerned will provide sufficient guidance as to what is and what is not appropriate. As a general recommendation, all discussions on GLDPM implementation should be conducted in a spirit of cooperation and discussion as this will undoubtedly make for a smoother process.	
GLDPM-v2_comment_006	5	5		It needs to be clarified that delivering an equivalent model of the distribution network by the DSO is the standard solution for these cases where the DSO network is required. Delivering a detailed model of the DSO network should be the exception for special cases where the TSO can prove that an equivalent model will not satisfy the requirements on the common grid model.	The reference to network elements "insofar as these are used in regional operational security analysis" including, where required, elements of distribution grids is quite deliberate as it would not be possible to define a criterion that defines what is and is not needed in a more clear-cut way and which would apply all across Europe. One size does not fit all. We expect there to be a lot of variation in requirements across the continent and we do not see why this should be a problem. The TSO is best placed to indicate what it does and does not use in regional operational security analysis. The GLDPM allows for equivalent models, but it should be for the TSO to say when this is appropriate and when it is not. That is why the drafting team opted for the formulation now contained in the GLDPM and we are pleased to note that by approving the GLDPM the NRAs agreed with us.	ENSO NETZ GmbH

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GLDPM-v2_comment_007	General comment			As already stated in the „DSO associations‘ response to ENTSO-E public consultation on the Common Grid Model Methodology and the Generation and Load Data Provision Methodology" for version 1 of the GLDPM and CGMM documents we as a DSO are surprised by the extensive scope of the foreseen methodology, and concerned by the licence TSOs intent to grant themselves for collecting data from grid users and other system operators. It seems to be necessary to define clear roles of responsibility. The TSOs as the operators of the transmission system are responsible for a safe operation of their system. They are responsible of keeping the data for the transmission system. The DSOs as the operators of the distribution system have the responsibility to operate their system. Therefore, they should be responsible for the data in their system. Based on these roles of responsibility data should be exchanged aggregated at the interfaces between TSO and DSO. TSO calculating detailed load flows in the DSO-networks would violate this system of responsibilities. Currently the TSOs in Germany use the version 1 of the GLDPM to establish their right to request full data of all distribution networks within their control zone without any detailed justification. This seems not to be the spirit of the GLDPM as a methodology to describe the way to build a common grid model of the transmission networks. It is necessary to clarify more detailed that the GLDPM refers only to the transmission networks. and dDistribution networks are not part of the common grid model. If there are exceptions, where it is necessary to model certain distribution networks, the TSO should be obligated to give substantial reasons for requesting the data of these specific networks. A general reference that it is necessary because a regional operational security analysis is performed cannot be a	See reply to the preceding comment. It would not be appropriate for the drafting team to comment on the specific situation in any particular member state.	ENSO NETZ GmbH

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				sufficient reason. If the GLDPM is evolved further it should reflect the proven model of cascading data delivery.		
GLDPM-v2_comment_008	1447	318		EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids welcome the clarifications introduced in GLDPM Articles 3 & 18 to limit the risk of increased reporting obligations imposed on SGUs. However, these developments do not dispel all concerns on the scope of data to be provided by SGUs. The draft methodologies could still 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 this data will be left to local implementation rules (cf. Article 18) 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, the undersigned wish to reiterate that the decision on the sharing of data provision obligations between system operators and SGUs should be based on stakeholder consultation and subject to NRAs approval according to the principle of	We note, first of all, that the term "SGU" or "significant grid user" is not used in the GLDPM. The drafting team trust that, contrary to your assertion, the provisions in Article 3 of the GLDPM as well as Article 18 provide sufficient safeguards against inappropriate or excessive requirements. We are pleased to note that, by approving the GLDPM, the NRAs have agreed to this view.	EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids

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				economic efficiency as clearly mentioned in the draft System Operation Guideline (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). TSOs should not take the responsibility to unilaterally decide on the scope of SGUs' obligations. If the local TSO decides to request data and to elaborate local implementation rules according to Article 18, they 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.		

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GLDPM-v2_comment_009	18	5		Article 5 of the present draft GLDPM proposal states that the data to be provided by DSOs and closed DSOs shall comprise not only data on grid elements in voltage levels of 220 kV or above – are usually operated by the TSO – but also data on grid elements in voltage levels "of less than 220 kV [if] they are used in regional operational security analysis" (Article 5.1.b revised draft GLDPM Guideline). EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids do not support the idea to pass on to the TSO detailed data on distribution grid assets such as sub-stations, lines or cables, power transformers including phase-shifting power transformers, power compensation devices and flexible AC transmission systems. The impact of the exact layout at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. Instead, it should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. This would align article 5 of GLDPM with article 19 paragraph 3 of the CACM regulation, which limits IGMs to the transmission system. As GLDPM must only address data to build up the respective IGM, this limit has to be respected by GLDPM as well. Our proposal for the art. 5: 1. For the purposes described in Regulation 2016/1719, provision of equivalent models for the distribution system by the respective DSO shall be deemed sufficient. 2. Distribution and closed distribution system operators shall provide the structural data described in paragraph 2 of this Article if these grid elements are operated by a TSO and pertain to a voltage level	The reference to network elements "insofar as these are used in regional operational security analysis" including, where required, elements of distribution grids is quite deliberate as it would not be possible to define a criterion that defines what is and is not needed in a more clear-cut way and which would apply all across Europe. One size does not fit all. We expect there to be a lot of variation in requirements across the continent and we do not see why this should be a problem. The TSO is best placed to indicate what it does and does not use in regional operational security analysis. The GLDPM allows for equivalent models, but it should be for the TSO to say when this is appropriate and when it is not. That is why the drafting team opted for the formulation now contained in the GLDPM and we are pleased to note that by approving the GLDPM the NRAs agreed with us. The suggestions in this comment seem to be based on an erroneous interpretation of Article 19(3): The legal definition of "transmission" in Article 2(3) of Directive 2009/72/EG makes it clear that, at a minimum, the transmission system encompasses the high-voltage grid. We therefore see no need for making the changes suggested.	EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids

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				a. of 220 kV or above; b. of less than 220 kV and they are used in regional operational security analysis. [....] 3. 4. Distribution and closed distribution system operators shall provide a model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV (#005) and operated by a TSO if a. these parts of the grid are used in regional operational security analysis, or b. the relevant grid elements in those parts of the grid are connecting i. a generation unit or load modelled in detail in accordance with Article 8 or 11 to the 220 kV or higher voltage level; or ii. two nodes at the 220 kV or higher voltage level. [….]		

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GLDPM-v2_comment_010	20	6		For the same reasons as described for art. 5, there is no need to amend the requirements with regard to the provisions of "infrequently changing variable data" laid down in Article 6 of the current draft GLDPM proposal. The impact of the exact layout and status at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. It should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. Our proposal for the art. 6: 1. For the purposes described in Regulation 2016/1719, provision of infrequently changing variable data for the distribution system is not necessary. 2. Distribution and closed distribution system operators shall provide the following infrequently changing variable data for the relevant network elements: a. the tap position of all modelled power transformers including phase-shifting transformers without regulation (#024); [....]	We refer to the response to the preceding question. As for which data are required for which purpose, we shall revise the draft GLDPM such that this becomes suitably clear.	EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
GLDPM-v2_comment_011	22	7	1	Article 7 of the GLDPM proposal prescribes the types of variable data which are to be delivered by DSOs and closed DSOs to the TSO. The revised draft presented on 14 February 2017 incorporates the provision of information on topological remedial actions pursuant to Article 14 of Regulation (EU) 2016/1719 (FCA regulation). This Article 14 of the FCA regulation reads: "If remedial actions are taken into account in the long-term capacity calculation, each TSO shall ensure that those remedial actions are technically available in real time operation and meet the requirements set out in Article 25 of Regulation (EU) 2015/1222." That means there is no need for the TSO to take remedial actions in his own grid into account. Having this in mind, why does a TSO need information regarding remedial actions in the distribution system, no matter whether it is foreseen to take them into account or not? The impact of remedial actions at distribution level is so small that taking them into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy than the possible additional accuracy provided by this information. Apart from this, the TSO is not in the position to "ensure that those remedial actions are technically available in real time operation" if they are foreseen for the distribution system. Our proposal for the art. 7.1: 1. For the purposes described in Regulation 2015/1222, distribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5: a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable (#025); b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 and Article 14 of Regulation	We do not agree with the claim that there is no need for the TSO to take remedial actions in its own grid into account. It is not clear what this assertion is based upon. As for the relevance or not of including or not including certain data, we refer to our general comments above. That said, we shall revise the draft GLDPM such that it is suitably clear which data are required for which purpose.	EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids

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				2016/1719, respectively, as well as topological agreed measures pursuant to the common grid model methodology (#026); c. forced unavailability of modelled equipment if applicable for the concerned time-frame (#028).		
GLDPM-v2_comment_012	45	17	2	EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids welcome the positive evolution introduced following the first consultation, as far as TSOs have deleted the possibility for TSOs to sanction stakeholders for "insufficient data quality". The new wording of article 17.2 seems much more balanced and appropriate, as far as from now on, the TSO "shall in the first instance attempt to resolve these problems directly with the entity concerned".	The drafting team is pleased to note that the comment is supportive of the GLDPM formulation cited.	EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids

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GLDPM-v2_comment_013	18	5		Article 5 of the present draft GLDPM proposal states that the data to be provided by DSOs and closed DSOs shall comprise not only data on grid elements in voltage levels of 220 kV or above – which are usually operated by the TSO – but also data on grid elements in voltage levels "of less than 220 kV [if] they are used in regional operational security analysis" (Article 5.1.b revised draft GLDPM Guideline). innogy does not support the idea to pass on to the TSO detailed data on distribution grid assets such as sub-stations, lines or cables, power transformers including phase-shifting power transformers, power compensation devices and flexible AC transmission systems. The impact of the exact layout at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. Instead, it should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. This would align article 5 of GLDPM with article 19 paragraph 3 of the CACM regulation, which limits IGMs to the transmission system. As GLDPM must only address data to build up the respective IGM, this limit has to be respected by GLDPM as well. Our proposal for art. 5: 1. For the purposes described in Regulation 2016/1719, provision of equivalent models for the distri-bution system by the respective DSO shall be deemed sufficient. 2. Distribution and closed distribution system operators shall provide the structural data described in paragraph 2 of this Article if these grid elements are operated by a TSO and pertain to a voltage level a. of 220 kV or above; b. of less than 220 kV and they are used in regional operational security analysis.	The reference to network elements "insofar as these are used in regional operational security analysis" including, where required, elements of distribution grids is quite deliberate as it would not be possible to define a criterion that defines what is and is not needed in a more clear-cut way and which would apply all across Europe. One size does not fit all. We expect there to be a lot of variation in requirements across the continent and we do not see why this should be a problem. The TSO is best placed to indicate what it does and does not use in regional operational security analysis. The GLDPM allows for equivalent models, but it should be for the TSO to say when this is appropriate and when it is not. That is why the drafting team opted for the formulation now contained in the GLDPM and we are pleased to note that by approving the GLDPM the NRAs agreed with us. The suggestions in this comment seem to be based on an erroneous interpretation of Article 19(3): The legal definition of "transmission" in Article 2(3) of Directive 2009/72/EG makes it clear that, at a minimum, the transmission system encompasses the high-voltage grid. We therefore see no need for making the changes suggested.	innogy SE

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				[….] 3. 4. Distribution and closed distribution system operators shall provide a model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV (#005) and operated by a TSO if a. [….]		
GLDPM-v2_comment_014	20	6		For the same reasons as described for art. 5, there is no need to amend the requirements with regard to the provisions of "infrequently changing variable data" laid down in Article 6 of the current draft GLDPM proposal. The impact of the exact layout and status at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. It should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. Our proposal for art. 6: 1. For the purposes described in Regulation 2016/1719, provision of infrequently changing variable data for the distribution system is not necessary.	We refer to the response to the preceding question. As for which data are required for which purpose, we shall revise the draft GLDPM such that this becomes suitably clear.	innogy SE

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				2. Distribution and closed distribution system operators shall provide the following infrequently changing variable data for the relevant network elements: a. the tap position of all modelled power transformers including phase-shifting transformers without regulation (#024); [....]		
GLDPM-v2_comment_015	22	7	1	Article 7 of the GLDPM proposal prescribes the types of variable data which are to be delivered by DSOs and closed DSOs to the TSO. The revised draft presented on 14 February 2017 incorporates the provision of information on topological remedial actions pursuant to Article 14 of Regulation (EU) 2016/1719 (FCA regulation). This Article 14 of the FCA regulation reads: "If remedial actions are taken into account in the long-term capacity calculation, each TSO shall ensure that those remedial actions are technically available in real time operation and meet the requirements set out in Article 25 of Regulation (EU) 2015/1222." That means there is no need for the TSO to take remedial actions in his own grid into account. Having this in mind, why does a TSO need information regarding remedial actions in the distribution system, no matter whether it is foreseen to take them into account or not? The impact of remedial actions at distribution level is so small that taking them into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy than the possible additional accuracy provided by this information. Apart from this, the TSO is not in the position to "ensure that those remedial actions are technically available in real time operation" (as stipulated) if they	We do not agree with the claim that there is no need for the TSO to take remedial actions in its own grid into account. It is not clear what this assertion is based upon. As for the relevance or not of including or not including certain data, we refer to our general comments above. That said, we shall revise the draft GLDPM such that it is suitably clear which data are required for which purpose.	innogy SE

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				are foreseen for the distribution system. Our proposal for art. 7.1: 1. For the purposes described in Regulation 2015/1222, distribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5: a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable (#025); b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 as well as topological agreed measures pursuant to the common grid model methodology (#026); c. forced unavailability of modelled equipment if applicable for the concerned time-frame (#028).		
GLDPM-v2_comment_016	45	17	2	innogy welcomes the positive evolution introduced following the first consultation, as far as TSOs have deleted the possibility for TSOs to sanction stakeholders for "insufficient data quality". The new wording of article 17.2 seems much more balanced and appropriate, as far as from now on, the TSO "shall in the first instance attempt to resolve these problems directly with the entity concerned".	The drafting team is pleased to note that the comment is supportive of the GLDPM formulation cited.	innogy SE

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GLDPM-v2_comment_017	General Comments	General Comments	General Comments	GENERAL COMMENTS EDF welcomes this ENTSO-E consultation on the TSOs common draft proposal for a revised version of both the Common Grid Model Methodology (CGMM) and the 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 and FCA Guidelines (and later on the System Operation Guidelines) 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 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. Following the first consultation on these two methodologies to implement the CACM Regulation, these revised versions of CGMM and GLDPM now incorporate requirements deriving from FCA Regulation to cover long-term time-frames. As a first feedback on these new versions, EDF wishes to acknowledge TSOs' efforts to respond to the comments received during the first public consultation and noted some positive evolutions compared to the previous documents submitted to consultation, (such as for instance: the clarification of the binding provisions from the explanatory ones, or the limitation of TSOs' discretion in setting deadlines and demanding data and	The drafting team is pleased to note that the comment is generally supportive of the GLDPM passages referred to therein.	EDF SA

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				also some transparency efforts on the list of scenarios used for the long-term time-frames).		

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GLDPM-v2_comment_018	Line 47	Article 18		- EDF wishes to welcome some clarifications introduced in GLDPM (articles 3 and 18) to limit the risk of increased reporting obligations imposed on SGUs. For instance, in article 18 of the GLDPM, TSOs shall make sure that they "make use of existing infrastructures and data delivery processes to the extent possible". Similarly, we welcome the limitations introduced in article 3 providing that: "each TSO shall have the right but not the obligation to obtain these data […]" under the following restrictive conditions that: i) it is used to build the IGM or CGM; ii) and that the "data are not already available to the TSO" either pursuant to national legal/contractual framework or as data publicly available via the central information transparency platform. We also noted a positive evolution in Recital (22), clarifying that "the GLDPM Proposal prevents double reporting of information by the addresses of the proposal" and that "the proposal further allows for the continuation of data provision under existing mechanisms in individual jurisdictions throughout the Union, thus ensuring as minimal impact as possible on the addressees of the proposal". In this respect, EDF welcomes the recent decision published by ENTSO-E , where some TSOs (e.g. APG, Elia, NGET, and RTE) have explicitly indicated that for the time being, they would not seek to obtain data under the implementation of the first version of the GLDPM. This publication corresponds to the implementation of article 18(2) of GLDPM and article 16(6) of CACM Regulation, whereby TSOs shall, by one month after the approval of the present methodology: i) inform the entities required to provide data and ii) prepare the related draft implementation rules on the practicalities of data provision. - However, these developments do not dispel all concerns on the scope of data to be provided by SGUs. o To ensure good visibility and predictability, EDF	We note, first of all, that the term "SGU" or "significant grid user" is not used in the GLDPM. The drafting team do not agree that "the identification of the specific data to be provided and the deadlines for the provision of these data will be left to local implementation rules". The drafting team trust that, contrary to your assertion, the provisions in Article 3 of the GLDPM as well as Article 18 provide sufficient safeguards against inappropriate or excessive requirements. Article 16 serves as a safeguard with respect to deadlines. We are pleased to note that, by approving the GLDPM, the NRAs have agreed to this view. As for the scope for updates to the information requested by TSOs under the GLDPM, while it is obvious that updates of the information required cannot be ruled out in future, the GLDPM does not have any explicit rules on when (in which intervals) the information requested may be updated. For the time being, the drafting team trust that common sense on the part of all parties concerned will provide sufficient guidance as to what is and what is not appropriate. The drafting team also recommend that all discussions on GLDPM implementation be conducted in a spirit of cooperation and discussion as this will undoubtedly make for a smoother process. 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	EDF SA

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				considers, that it would be helpful to specify the duration associated to the decision of some TSOs to not seek data under the GLDPM implementation process. o As stated in the first consultation, the draft methodologies could still 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 rules, 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 wishes to reiterate that the decision on the sharing of data provision obligations between system operators and SGUs should be based on stakeholder consultation and subject to NRAs approval 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 optimization between the highest overall efficiency and lowest total costs for all parties involved" (Article 4.2(c)). Therefore, if the local TSO decides to request data and to elaborate local implementation rules according to article 18, EDF would like to insist on the fact that 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.	protection). We trust that stakeholders will find that approach reassuring.	
GLDPM-v2_comment_019	Line 33	Article 12	Paragraphs 1 and 2	As concerns the provision of load variable data pursuant to article 12 (line 33), EDF would like to explicitly clarify that the "aggregators of loads" could not be interpreted as referring to Balance Responsible Party. On article 12.1, we could also question the necessity to request the provision of scheduled active from "load owners", in accordance with the above mentioned principle (see our	"Aggregators of loads" will likely be balance-responsible parties (BRPs), but they are not the same thing as BRPs in that there are many BRPs that are not "aggregators of loads". The provision of data on scheduled active consumption may indeed be necessary in order for a TSO to be able to build its IGM; the GLDPM therefore allows TSOs to ask for these data.	EDF SA

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
				comments on article 18).		
GLDPM-v2_comment_020	Line 45	Article 17	Paragraph 2	- As concerns article 17 (line 45) of the GLDPM, EDF wishes to welcome the positive evolution introduced following the first consultation, as far as TSOs have deleted the possibility for TSOs to sanction stakeholders for "insufficient data quality". The new wording of article 17.2 seems much more balanced and appropriate, as far as from now on, the TSO "shall in the first instance attempt to resolve these problems directly with the entity concerned".	The drafting team is pleased to note that the comment is supportive of the GLDPM formulation cited.	EDF SA
GLDPM-v2_comment_021		Art 10 1. Generation – variable data		In case a generation unit is shared and operated jointly by different market participants the respective originator of dispatch information shall provide the information (covered by 1. a.-g.) for the respective dispatch share of the generation unit.	Owners may delegate their reporting obligations in line with the provisions in Article 3 of the GLDPM (especially Article 3(4) and 3(5)).	TIWAG
GLDPM-v2_comment_022		Art 10 1. Generation – variable data		The originator of dispatch information provides the schedule for the respective generation unit with best care and according to the state of information given at the respective point in time with no liability. Since marginal cost driven dispatch depends on many variable factors (prices for power, gas, coal, CO2, weather forecasts for temperature / wind / solar radiation/ precipitation, cross boarder capacities, forex markets) we propose to provide in all cases only non binding and "best estimate" schedules for a generation unit. The reverse calculation from marginal costs and merit order curves to transmission capacities would lead to ignore changes by volatile market conditions. We suggest to better adapt the process and to take into account for the calculation that comparatively the grid is more static than the market.	The GLDPM as well as the Regulations that it is based upon contain general requirements with respect to data quality. Compliance with these requirements is to be monitored in line with Article 17 of the GLDPM.	TIWAG

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
GLDPM-v2_comment_023		Art 10 2. Generation – variable data		We want to underline that collected information on generation schedules could possibly be used for market manipulation and is therefore to be used restrictively: The TSOs having access to the information covered by 1. a.-g. shall guarantee and ascertain that the usage is restricted to capacity calculation purposes only.	It is understood that TSOs may not make use of the data obtained in an inappropriate or even illegal way. Article 10(2) is very specific in this respect.	TIWAG
GLDPM-v2_comment_024	5	Whereas		BDEW expects the long-term capacity calculation to need substantially less data than day-ahead and intraday capacity calculation. Unfortunately, the draft GLDPM proposal does not clearly mark which information is necessary for long-term and which for day-ahead calculation. This bears the risk of misunderstanding or even TSOs demanding inefficient amounts of data from grid users during national implementation. BDEW therefore demands a clear distinction between data needed following Regulation (EU) 2016/1719 (FCA Regulation) and Regulation (EU) 2015/1222 (CACM Regulation). As a general comment, in the view of BDEW the principles of an economical use of data and of economical information flows have to be respected in the GLDPM. Data provision requirements have to be restricted to data which are indispensable for the pursued objective and which are not provided in other ways.	The drafting team shall revise the draft GLDPM such that it is suitably clear which data are required for which purpose. The general requirements referred to in the comment are adequately addressed in Article 3 of the GLDPM.	BDEW Association of German Energy and Water Industries

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
GLDPM-v2_comment_025	18	5	1	Article 5 of the present draft GLDPM proposal states that the data to be provided by distribu-tion system operators (DSOs) and closed DSOs shall comprise not only data on grid elements in voltage levels of 220 kV or above – which is correct – but also data on grid elements in voltage levels "of less than 220 kV [if] they are used in regional operational security analysis" (Article 5.1.b revised draft GLDPM Guideline). BDEW does not support the idea to pass on to the TSO detailed data on distribution grid assets such as sub-stations, lines or cables, power transformers including phase-shifting power transformers, power compensation devices and flexible AC transmission systems. The impact of the exact layout at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. Instead, it should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. Therefore, BDEW asks to add the following provision in the beginning of Article 5.1 of the draft GLDPM: Article 5 – Distribution and closed distribution system operators – structural data new (our proposal): 1. For the purposes described in Regulation 2016/1719, provision of equivalent models for the distribution system by the respective DSO shall be deemed sufficient. 2. (formerly 1.): Distribution and closed distribution system operators shall provide the structural data	The reference to network elements "insofar as these are used in regional operational security analysis" including, where required, elements of distribution grids is quite deliberate as it would not be possible to define a criterion that defines what is and is not needed in a more clear-cut way and which would apply all across Europe. One size does not fit all. We expect there to be a lot of variation in requirements across the continent and we do not see why this should be a problem. The TSO is best placed to indicate what it does and does not use in regional operational security analysis. The GLDPM allows for equivalent models, but it should be for the TSO to say when this is appropriate and when it is not. That is why the drafting team opted for the formulation now contained in the GLDPM and we are pleased to note that by approving the GLDPM the NRAs agreed with us.	BDEW Association of German Energy and Water Industries

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
				described in paragraph 2 of this Article if these grid elements pertain to a voltage level a. of 220 kV or above; b. of less than 220 kV and they are used in regional operational security analysis. [....]		
GLDPM-v2_comment_026	20	6	1	For the same reasons as for Article 5, BDEW sees need to amend the requirements with regard to the provisions of "infrequently changing variable data" laid down in Article 6 of the current draft GLDPM proposal. These data do not provide any additional accuracy. Therefore, BDEW proposes to amend the present text proposal as follows: Article 6 – Distribution and closed distribution system operators – infrequently changing variable data new (our proposal): 1. For the purposes described in Regulation 2016/1719, provision of infrequently changing variable data for the distribution system is not necessary.	We refer to the response to the preceding question. As for which data are required for which purpose, we shall revise the draft GLDPM such that this becomes suitably clear.	BDEW Association of German Energy and Water Industries

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
				2. (formerly 1.): Distribution and closed distribution system operators shall provide the following in-frequently changing variable data for the relevant network elements: a. the tap position of all modelled power transformers including phase-shifting transform-ers without regulation (#24) [....]		
GLDPM-v2_comment_027	22	7	1	Article 7 of the GLDPM proposal prescribes the types of variable data which are to be deliv-ered by DSOs and closed DSOs to the TSO. The revised draft presented on 14 February 2017 incorporates the provision of information on topological remedial actions pursuant to Article 14 of Regulation (EU) 2016/1719 (FCA regulation). This Article 14 of the FCA regula-tion reads: "If remedial actions are taken into account in the long-term capacity calculation, each TSO shall ensure that those remedial actions are technically available in real time op-eration and meet the requirements set out in Article 25 of Regulation (EU) 2015/1222." That means there is no need for the TSO to take into account remedial actions in his own grid. Having this in mind, BDEW wonders why a TSO needs information regarding remedial actions in the distribution system, no matter whether it is foreseen to take them into account or not. The impact of remedial actions at distribution level is so small that taking them into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy than the possible additional accuracy provided by this information. Apart from this, the TSO is not in the position to	We do not agree with the claim that there is no need for the TSO to take remedial actions in its own grid into account. It is not clear what this assertion is based upon. As for the relevance or not of including or not including certain data, we refer to our general comments above. That said, we shall revise the draft GLDPM such that it is suitably clear which data are required for which purpose.	BDEW Association of German Energy and Water Industries

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
				"ensure that those remedial actions are tech-nically available in real time operation" if they are foreseen for the distribution system. Therefore, BDEW proposes to amend the present text proposal as follows: Article 7 – Distribution and closed distribution system operators –variable data 1. [new, our proposal] For the purposes described in Regulation 2015/1222, [end of insertion] distribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5: a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable (#025); b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 and Article 14 of Regulation 2016/1719, respectively, as well as topological agreed measures pursu-ant to the common grid model methodology (#026); c. forced unavailability of modelled equipment if applicable for the concerned time-frame (#028).		
GLDPM-v2_comment_028				See file attachment innogy-2017-04-06-comments-on-both-the-CGMM-v2-and-the-GLDPM-v2 submitted via email	See replies provided above	innogy SE
GLDPM-v2_comment_029				See file attachment bdew-2017-04-06-comments-on-GLDPM-v2 submitted via email	See replies provided above	BDEW Association of German Energy and Water Industries
GLDPM-v2_comment_030				See file attachment edf-2017-04-06-comments-on-both-the-CGMM-v2-and-the-GLDPM-v2 submitted via email	In response to a request to reviewers to point out factual errors in the draft Response to Consultation Comments, an email response was received from EDF. This email message is provided as a separate file attachment.	EDF SA
GLDPM-v2_comment_0				See file attachment eurelectric-et-al-2017-04-26-rejoinder submitted via email	In response to a request to reviewers to point out factual errors in the draft Response to Consultation Comments, an	EURELECTRIC, CEDEC, GEODE and EDSO for Smart

Unique_comment_ID	Line number	Article	Paragraph	Comment / Suggestion	PT CGM WP-1 response	Reviewer affiliation
31					email response was received from Eurelectric et al. This email message is provided as a separate file attachment.	Grids
GLDPM-v2_comment_032				See file attachment innogy-2017-04-26-rejoinder submitted via email	In response to a request to reviewers to point out factual errors in the draft Response to Consultation Comments, an email response was received from Innogy. This email message is provided as a separate file attachment.	innogy SE

Attachments: statements submitted as email attachments

File names (for future reference):

bdew-2017-04-06-comments-on-GLDPM-v2

edf-2017-04-06-comments-on-both-the-CGMM-v2-and-the-GLDPM-v2

eurelectric-et-al-2017-04-26-rejoinder

innogy-2017-04-06-comments-on-both-the-CGMM-v2-and-the-GLDPM-v2

innogy-2017-04-26-rejoinder

Energie. Wasser. Leben.

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Statement

on all TSOs‘ proposal for a generation and load data provision methodology (GLDPM-v2)

in response of ENTSO-E’s public consultation

6 April 2017

Introduction

The German Association of Energy and Water Industries (BDEW) represents over 1,800 members of the electricity, gas and water industry. In the energy sector, BDEW represents companies active in generation, trading, transmission, distribution and retail.

BDEW welcomes the opportunity to comment on ENTSO-E´s draft version of the revised proposal for a generation and load data provision methodology (GLDPM-v2), incorporating the requirements defined in two Guidelines: the Guideline on Capacity Allocation and Congestion Management (CACM Guideline) as well as the Guideline on Forward Capacity Allocation (FCA Guideline).[1]

The data procured with the help of the GLDPM will form the basis for the common grid model methodology (CGMM) which has been developed by ENTSO-E in parallel to GLDPM. Currently, both methodologies undergo changes due to the prescriptions of the above mentioned FCA Guideline. ENTSO-E also set out a consultation on the revised CGMM (CGMM-v2). BDEW will comment on the CGMM-v2 proposal in a separate document.

Taking into account that the transmission system operators (TSOs) organised within BDEW are, among others, responsible for the drafting and finalisation of the GLDPM, the BDEW Position Paper has been developed with the abstention of the German TSOs, in order not to influence the final result of the consultation.

Comments on GLDPM-v2

The GLDPM sets out requirements with respect to the delivery of the generation and load data required to establish a common grid model (CGM). The interdependencies between transmission grids cause that TSOs have to synchronise not only the operation but also the planning of their grids. Therefore, BDEW supports the idea to establish a CGM in order to enable TSOs to develop their transmission networks in accordance with the demands of the next decades. As a consequence of this, it is sensible to describe a common methodology which describes the type of data needed for a CGM and the way to procure them – it is sensible to describe a “GLDPM”.

In the view of BDEW, it is sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 17.2.b of the CACM regulation) and to prescribe that “[i]ndividual grid models shall cover all network elements of the transmission system that are used in regional operational security analysis for the concerned time-frame” (Article 19.3 of the CACM regulation).

[1] ENTSO-E: “All TSOs’ proposal for a generation and load data provision methodology in accordance with Article 16 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management as well as Article 17 of Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation (annotated version for public consultation)”, online at https://consultations.entsoe.eu/entso-e-general/gldpm-v2/

The GLDPM, however, goes beyond the prescriptions in the underlying CACM Guideline in several points. BDEW therefore asks to overhaul the respective prescriptions as described below.

GLDPM (revised draft), Article 5: Distribution and closed distribution system operators – structural data

Article 5 of the present draft GLDPM proposal states that the data to be provided by distribution system operators (DSOs) and closed DSOs shall comprise not only data on grid elements in voltage levels of 220 kV or above – which is correct – but also data on grid elements in voltage levels "of less than 220 kV [if] they are used in regional operational security analysis" (Article 5.1.b revised draft GLDPM Guideline).

BDEW does not support the idea to pass on to the TSO detailed data on distribution grid assets such as sub-stations, lines or cables, power transformers including phase-shifting power transformers, power compensation devices and flexible AC transmission systems. The impact of the exact layout at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information.

Instead, it should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. Therefore, BDEW asks to add the following provision in the beginning of Article 5.1 of the draft GLDPM:

> ***Article 5 – Distribution and closed distribution system operators – structural data***
>
> *1. For the purposes described in Regulation 2016/1719, provision of equivalent models for the distribution system by the respective DSO shall be deemed sufficient.*
>
> *~~1.~~ 2. Distribution and closed distribution system operators shall provide the structural data described in*
>
> *paragraph 2 of this Article if these grid elements pertain to a voltage level*
>
> *a. of 220 kV or above;*
>
> *b. of less than 220 kV and they are used in regional operational security analysis.*
>
> *[....]*

GLDPM (revised draft), Article 6: Distribution and closed distribution system operators – infrequently changing variable data

For the same reasons as described above, BDEW sees need to amend the requirements with regard to the provisions of "infrequently changing variable data" laid down in Article 6 of the current draft GLDPM proposal. These data do not provide any additional accuracy. Therefore, BDEW proposes to amend the present text proposal as follows:

Article 6 – Distribution and closed distribution system operators – infrequently changing variable data

1. For the purposes described in Regulation 2016/1719, provision of infrequently changing variable data for the distribution system is not necessary.

~~1.~~ 2. Distribution and closed distribution system operators shall provide the following infrequently changing variable data for the relevant network elements:

a. the tap position of all modelled power transformers including phase-shifting transformers without regulation (#24)

[....]

<u>GLDPM (revised draft), Article 7: Distribution and closed distribution system operators – variable data</u>

Article 7 of the GLDPM proposal prescribes the types of variable data which are to be delivered by DSOs and closed DSOs to the TSO. The revised draft presented on 14 February 2017 incorporates the provision of information on topological remedial actions pursuant to Article 14 of Regulation (EU) 2016/1719 (FCA regulation). This Article 14 of the FCA regulation reads: "If remedial actions are taken into account in the long-term capacity calculation, each TSO shall ensure that those remedial actions are technically available in real time operation and meet the requirements set out in Article 25 of Regulation (EU) 2015/1222."

That means there is no need for the TSO to take into account remedial actions in his own grid. Having this in mind, BDEW wonders why a TSO needs information regarding remedial actions in the *distribution* system, no matter whether it is foreseen to take them into account or not. The impact of remedial actions at distribution level is so small that taking them into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy than the possible additional accuracy provided by this information.

Apart from this, the TSO is not in the position to "ensure that those remedial actions are technically available in real time operation" if they are foreseen for the distribution system.

Therefore, BDEW proposes to amend the present text proposal as follows:

Article 7 – Distribution and closed distribution system operators –variable data

1. For the purposes described in Regulation 2015/1222, D~~d~~istribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5:

a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable (#025);

b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 ~~and Article 14 of Regulation 2016/1719, respectively,~~ as well as topological agreed measures pursuant to the common grid model methodology (#026);

c. forced unavailability of modelled equipment if applicable for the concerned time-frame (#028).

General comment

BDEW expects the long-term capacity calculation to need substantially less data than day-ahead and intraday capacity calculation. Unfortunately, the draft GLDPM proposal does not clearly mark which information is necessary for long-term and which for day-ahead calculation. This bears the risk of misunderstanding or even TSOs demanding inefficient amounts of data from grid users during national implementation.

BDEW therefore demands a clear distinction between data needed following Regulation (EU) 2016/1719 (FCA Regulation) and Regulation (EU) 2015/1222 (CACM Regulation).

As a general comment, in the view of BDEW the principles of an economical use of data and of economical information flows have to be respected in the GLDPM. Data provision requirements have to be restricted to data which are indispensable for the pursued objective and which are not provided in other ways.

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ENTSO-E consultation: TSOs' draft proposal for a Common Grid Model Methodology (CGMMv2) and a Generation and Load Data Provision Methodology (GLDPMv2)

EDF Response

6th April 2017

GENERAL COMMENTS

EDF welcomes this ENTSO-E consultation on the TSOs common draft proposal for a revised version of both the Common Grid Model Methodology (CGMM) and the 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 and FCA Guidelines (and later on the System Operation Guidelines) 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 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.

Following the first consultation on these two methodologies to implement the CACM Regulation, these revised versions of CGMM and GLDPM now incorporate requirements deriving from FCA Regulation to cover long-term time-frames.

As a first feedback on these new versions, EDF wishes to acknowledge TSOs' efforts to respond to the comments received during the first public consultation and noted some positive evolutions compared to the previous documents submitted to consultation, (such as for instance: the clarification of the binding provisions from the explanatory ones, or the limitation of TSOs' discretion in setting deadlines and demanding data and also some transparency efforts on the list of scenarios used for the long-term time-frames).

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

1. Transparency on the Common Grid model (articles 3.1 and 3.2 of CGMM):

- **EDF welcomes TSOs proposal to publish the list of scenarios established for the following year / month**, including their description and the period during which these scenarios are to be used by the TSO. It is as a positive evolution in terms of transparency, as it will enable market participants to have access to scenarios used to build Individual Grid models (IGM) and Common Grid models (CGM).

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- While recognizing TSOs' efforts, **EDF also considers that the publication of scenarios should also be accompanied by the publication of the resulting IGMs/CGMs**. The reason for keeping CGMs data confidential are not very clear, especially for long-term times-frames, as far as they reflect the best forecast made by system operators without any confidential or commercially sensitive information. The availability of this data would be useful to provide stakeholders with a better visibility on the level of available cross-border capacity and to enable market participants to better anticipate the potential evolutions of market prices. It may also contribute to improve the accuracy of the forecasts provided by Significant Grid Users (SGUs). A good level of transparency on the CGMs would also 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 SGUs on the scope of data to be provided according to GLDPM (article 18, line 47 / article 12, line 33)**

- **EDF wishes to welcome some clarifications introduced in GLDPM (articles 3 and 18) to limit the risk of increased reporting obligations imposed on SGUs.** For instance, in article 18 of the GLDPM, TSOs shall make sure that they *"make use of existing infrastructures and data delivery processes to the extent possible".* Similarly, we welcome the limitations introduced in article 3 providing that: *"each TSO shall have the right but not the obligation to obtain these data […]"* under the following restrictive conditions that: i) it is used to build the IGM or CGM; ii) and that the "*data are not already available to the TSO"* either pursuant to national legal/contractual framework or as data publicly available via the central information transparency platform. We also noted a positive evolution in Recital (22), clarifying that *"the GLDPM Proposal prevents double reporting of information by the addresses of the proposal"* and that *"the proposal further allows for the continuation of data provision under existing mechanisms in individual jurisdictions throughout the Union, thus ensuring as minimal impact as possible on the addressees of the proposal".*
  In this respect, **EDF welcomes the recent decision published by ENTSO-E[1], where some TSOs (e.g. APG, Elia, NGET, and RTE) have explicitly indicated that for the time being, they would not seek to obtain data under the implementation of the first version of the GLDPM.** This publication corresponds to the implementation of article 18(2) of GLDPM and article 16(6) of CACM Regulation, whereby TSOs shall, by one month after the approval of the present methodology: i) inform the entities required to provide data and ii) prepare the related draft implementation rules on the practicalities of data provision.

- However, **these developments do not dispel all concerns on the scope of data to be provided by SGUs.**
  - To ensure good visibility and predictability, EDF considers, that it would be helpful to **specify the duration associated to the decision of some TSOs to not seek data** under the GLDPM implementation process.

[1] See ENTSO-E website.

- As stated in the first consultation, the draft methodologies could still 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 rules, 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 wishes to reiterate that the decision on the sharing of data provision obligations between system operators and SGUs should be based on stakeholder consultation and subject to NRAs approval 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 optimization between the highest overall efficiency and lowest total costs for all parties involved"* (Article 4.2(c)).

  Therefore, if the local TSO decides to request data and to elaborate local implementation rules according to article 18, EDF would like to insist on the fact that 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.

- Furthermore, as concerns the provision of load variable data pursuant to article 12 (line 33), EDF would like to explicitly clarify that the "aggregators of loads" could not be interpreted as referring to Balance Responsible Party. On article 12.1, we could also question the necessity to request the provision of scheduled active from "load owners", in accordance with the above mentioned principle.

3. **Data quality obligations :**

- As concerns article 17 (line 45) of the GLDPM, EDF wishes to welcome the positive evolution introduced following the first consultation, as far as TSOs have deleted the possibility for TSOs to sanction stakeholders for *"insufficient data quality".* The new wording of article 17.2 seems much more balanced and appropriate, as far as from now on, the TSO *"shall in the first instance attempt to resolve these problems directly with the entity concerned".*

- Concerning the quality monitoring of the CGMM according to article 23 (line 96), EDF considers however (as stated in the first version of this methodology) that **TSOs should elaborate and make public some key performance indicators to evaluate the accuracy of IGMs and CGM**s. This further transparency effort would be useful:
  - to select the most appropriate value of reliability margin used as a base case for capacity calculation;
  - to allow all interested parties to improve their own estimates;
  - and to contribute, more generally, to the improvement of the methodologies and the scenarios used by TSOs with a benefit in terms of efficient operations of the electricity system.

ooOoo

Thank you for the opportunity to point out factual errors in ENTSO-E's CGMM and GLDPM draft responses. On behalf of EURELECTRIC, CEDEC, GEODE and EDSO for Smart Grids, I would like to share with you our comments related:

1) In the statements of ENTSO-E, regarding comments **CGMM-v2_comment_004, CGMM-v2_comment_009, CGMM-v2_comment_011 and CGMM-v2_comment_014**, ENTSO-E states: "The legal definition of "transmission" in Article 2(3) of Directive 2009/72/EG makes it clear that, at a minimum, the transmission system encompasses the high-voltage grid."

   This is not correct. The same directive 2009/72/EC defines in Article 2(5) that the high-voltage systems are part of the distribution systems ("'distribution' means the transport of electricity on high-voltage, medium-voltage and low-voltage distribution systems with a view to its delivery to customers, but does not include supply;"). It is misleading to state that this directive makes clear that HV-networks are part of the transmission system. The directive doesn't make clear which grids are transmission and which distribution, this is to a larger extent left to the member states.

   Considering the fact that in most European countries DSOs own and operate systems at a voltage level of 110 kV and more (http://www.eurelectric.org/media/113155/dso_report-web_final-2013-030-0764-01-e.pdf), following ENTSO-E's statement puts the design of the energy system in Europe upside down. The task to prescribe how Member States shall design their energy systems has to be left to the national legislators.

2) ENTSO-E states in the comments mentioned in 1) that our comments seem to contradict themselves. Could you clarify this statement for the final response?

Drafting team reply: The comment is inserted below; the contradictory formulations are highlighted.

Articles 6.1 and 6.3 describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. This should be limited to grid operated by TSOs, as article 19 paragraph 3 of underlying EC/1222/2015 prescribes.

Our proposal for the art. 6.1:

1. The grid elements described in paragraph 2 of this Article shall be included in each IGM regardless of whether these are operated by the TSO or a DSO (incl. CDSO) if these grid elements are operated by a TSO and of a voltage level

a. of 220 kV or above;

b. of less than 220 kV and the grid elements of which are used in regional operational security analysis.

Our proposal for the art. 6.3:

A model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV (#005) shall be included in the IGM regardless of whether these parts of the grid are operated by the TSO or a DSO (incl. CDSO) if these grid elements are operated by a TSO and

a. these parts of the grid have elements which are used in regional operational security

> analysis, or
> b. the relevant grid elements in those parts of the grid are connecting
> i. a generation unit or load modelled in detail in accordance with Article 8 or 9 to the 220 kV or higher voltage level;
> ii. two nodes at the 220 kV or higher voltage level.

3) Some comments by ENTSO-E regarding the **GLDPMv2** are based on the same error as explained in 1).

4) We propose ENTSO-E to introduce *an additional workshop* after the consultation phase has ended, to further improve the stakeholder engagement. ENTSO-E could invite to the workshop all parties who have taken part to the consultation, and the drafting team of ENTSO-E could use the time between the consultation end-date and the workshop to prepare amendments for solving comments.

   At the workshop, comments and solutions would be proposed by ENTSO-E, explained and discussed with stakeholders with the aim to come to consensual agreements (no hard condition, of course). After the workshop, all comments, amendments and the draft final document would be published.

   Such a process is already a good practice at national and international standardisation bodies, for example. It leads to higher acceptance of documents but still ensures the drafting team has sufficient influence on the document itself. We note that during drafting of network codes there were some meetings which were similar to this approach, for example for Emergency & Restoration.

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Essen, April 6th 2017

Public consultation on the revised Generation and Load Data Provision Methodology (GLDPM) and the revised Common Grid Model Methodology (CGMM) pursuant to article 17 and 18, respectively, of Regulation 2016/1719

Dear Ladies and Gentlemen,

thanks a lot for the opportunity to respond to the draft documents of

- the Generation and Load Data Provision Methodology pursuant to Article 17 of Regulation 2016/1719 ("GLDPM-v2") and
- the Common Grid Model Methodology pursuant to Article 18 of Regulation 2016/1719 ("CGMM-v2"),

as stakeholder.

The consultations incorporate the requirements defined in two Guidelines: Guideline on Capacity Allocation and Congestion Management (CACM) and Guideline on Forward Capacity Allocation (FCA). Currently, both methodologies undergo changes due to the prescriptions of the FCA Guideline.
The Common Grid Model Methodology (CGMM) and Generation and Load Data Provision Methodology (GLDPM) are closely linked. GLDPM describes the data required by the TSOs to establish a common grid model, enabled by CGMM and based on the data received from DSOs and grid users.
As one of the larger holdings of DSO-business' in the European Union with electricity DSO-subsidies in Germany, Austria, Poland, Slovakia and Hungary, we are heavily affected by the methodologies.
innogy acknowledges some positive evolutions compared to the previous version submitted to consultation, such as the clarification of the binding paragraphs and explanatory ones. However, due to incoherency with both the underlying CACM regulation and FCA regulation, innogy would welcome a revision of the proposals in question.
From our point of view it is sensible to describe a common methodology, GLDPM, which describes the type of data needed for a CGM and the way to procure them. It is also sensible to base the CGM on individual grid models (IGMs) developed by the TSOs (Article 17.2.b and 17.2.c of the CACM regulation) and to prescribe that "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" (Article 19.3 of the CACM regulation). However, the currently proposed version of CGMM is not fully in line with this provision. As stated in Article 5 of the present draft CGMM proposal, the data included in the TSOs' individual grid models (IGMs) "shall contain the elements of the high-voltage and extra high-voltage network insofar as these are used in regional operational security analysis for the concerned time-frame". This does not take into account that in many European countries where innogy owns distribution systems, from Germany and Austria to Poland and Hungary, the high-voltage grids are not part of the transmission system and are not operated by the TSOs but by DSOs. With regard to these grids, the proposals go beyond the scope of application in the underlying CACM regulation and FCA regulation, as article 20 of the latter regulation is directly linked to article 19 of CACM.
Regarding GLDPM, innogy expects the long-term capacity calculation to need substantially less data than day-ahead and intraday capacity calculation. Currently, the draft GLDPM proposal does not clearly mark which information is necessary for long-term and which for day-ahead calculation. This bears the risk of misunderstandings or TSOs demanding inefficient amounts of data from grid users during national implementation. A clear distinction should be made between data needed following (EU) 2016/1719 and (EU) 2015/1222.
Please find attached a table stating detailed comments and suggestions for change from our side.
This data will be fed into your consultation hub in time.

Yours sincerely

innogy SE

sgd. i. V. Gerhard Mölder sgd. i. V. Dr. Patrick Wittenberg

Document	Line number	Article	Paragraph	Comment / Suggestion
CGMM	30	5		This provision in the CGMM proposal does not take into account that in many European countries, e. g. in Germany, the high-voltage grids are not part of the transmission system and are not operated by the TSOs but by DSOs. With regard to these grids, the CGMM proposal goes beyond the scope of application set by the above cited provisions in the underlying CACM regulation. This is not in line with the basics of European legislation. Art. 5 of the draft CGMM proposal scope of application should be limited to those elements that are operated by a TSOs and used in a regional operational security analysis to be in line with article 19 of CACM regulation and article 20 of FCA regulation. Proposed amended version of article 5 paragraph 1: "1. IGMs shall contain the elements of the high-voltage and extra high-voltage network insofar as these are operated by a TSO and used in regional operational security analysis for the concerned time-frame."

CGMM	32	6	1 3	Articles 6.1 and 6.3 describe in detail which grid elements shall be included in the IGMs. Among these there are numerous grid elements belonging to the high-voltage grids. In these paragraphs, ENTSO-E acknowledges that these grids may be run either by TSOs or by DSOs; but the provisions say that the grid elements have to be included in the IGMs regardless of the operator. This should be limited to grid operated by TSOs, as article 19 paragraph 3 of underlying EC/1222/2015 prescribes. Proposed amended version of article 6 paragraph 1: "1. The grid elements described in paragraph 2 of this Article shall be included in each IGM ~~regardless of whether these are operated by the TSO or a DSO (incl. CDSO)~~ if these grid elements are operated by a TSO and of a voltage level a. of 220 kV or above; b. of less than 220 kV and the grid elements of which are used in regional operational security analysis." Proposed amended version of article 6 paragraph 3: "A model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV (#005) shall be included in the IGM ~~regardless of whether these parts of the grid are operated by the TSO or a DSO (incl. CDSO)~~ if these grid elements are operated by a TSO and a. these parts of the grid have elements which are used in regional operational security analysis, or b. the relevant grid elements in those parts of the grid are connecting i. a generation unit or load modelled in detail in accordance with Article 8 or 9 to the 220 kV or higher voltage level; ii. two nodes at the 220 kV or higher voltage level."

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Document	Line number	Article	Paragraph	Comment / Suggestion
GLDPM	18	5		Article 5 of the present draft GLDPM proposal states that the data to be provided by DSOs and closed DSOs shall comprise not only data on grid elements in voltage levels of 220 kV or above – which are usually operated by the TSO – but also data on grid elements in voltage levels "of less than 220 kV [if] they are used in regional operational security analysis" (Article 5.1.b revised draft GLDPM Guideline). innogy does not support the idea to pass on to the TSO detailed data on distribution grid assets such as sub-stations, lines or cables, power transformers including phase-shifting power transformers, power compensation devices and flexible AC transmission systems. The impact of the exact layout at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. Instead, it should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. This would align article 5 of GLDPM with article 19 paragraph 3 of the CACM regulation, which limits IGMs to the transmission system. As GLDPM must only address data to build up the respective IGM, this limit has to be respected by GLDPM as well. **Our proposal for art. 5:** 1. For the purposes described in Regulation 2016/1719, provision of equivalent models for the distribution system by the respective DSO shall be deemed sufficient. 2. Distribution and closed distribution system operators shall provide the structural data described in paragraph 2 of this Article if these grid elements are operated by a TSO and pertain to a voltage level a. of 220 kV or above; b. of less than 220 kV and they are used in regional operational security analysis. [....] ~~3.~~ 4. Distribution and closed distribution system operators shall provide a model or an equivalent model of those parts of the grid operated at a voltage of less than 220 kV (#005) and operated by a TSO if a. [....]

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Document	Line number	Article	Paragraph	Comment / Suggestion
GLDPM	20	6		For the same reasons as described for art. 5, there is no need to amend the requirements with regard to the provisions of “infrequently changing variable data” laid down in Article 6 of the current draft GLDPM proposal. The impact of the exact layout and status at distribution level is so small that taking it into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy (e.g. generation shift key) than the possible additional accuracy provided by this information. It should be sufficient to prescribe that DSOs provide for equivalent models for their distribution systems to the TSO. **Our proposal for art. 6:** 1. For the purposes described in Regulation 2016/1719, provision of infrequently changing variable data for the distribution system is not necessary. 2. Distribution and closed distribution system operators shall provide the following infrequently changing variable data for the relevant network elements: a. the tap position of all modelled power transformers including phase-shifting transformers without regulation (#024); [....]
GLDPM	22	7	1	Article 7 of the GLDPM proposal prescribes the types of variable data which are to be delivered by DSOs and closed DSOs to the TSO. The revised draft presented on 14 February 2017 incorporates the provision of information on topological remedial actions pursuant to Article 14 of Regulation (EU) 2016/1719 (FCA regulation). This Article 14 of the FCA regulation reads: "If remedial actions are taken into account in the long-term capacity calculation, each TSO shall ensure that those remedial actions are technically available in real time operation and meet the requirements set out in Article 25 of Regulation (EU) 2015/1222." That means there is no need for the TSO to take remedial actions in his own grid into account. Having this in mind, why does a TSO need information regarding remedial actions in the distribution system, no matter whether it is foreseen to take them into account or not? The impact of remedial actions at distribution level is so small that taking them into account does not provide any additional accuracy, as the accompanying data sources have a much greater inaccuracy than the possible additional accu-

Document	Line number	Article	Paragraph	Comment / Suggestion
				racy provided by this information. Apart from this, the TSO is not in the position to "ensure that those remedial actions are technically available in real time operation" (as stipulated) if they are foreseen for the distribution system. **Our proposal for art. 7.1:** 1. For the purposes described in Regulation 2015/1222, distribution and closed distribution system operators shall provide the following variable data for the network elements referred to in Article 5: a. the planned or forced unavailability of modelled items of equipment that are known or expected to be unavailable (#025); b. topological remedial actions pursuant to Article 25 of Regulation 2015/1222 ~~and Article 14 of Regulation 2016/1719, respectively~~, as well as topological agreed measures pursuant to the common grid model methodology (#026); c. forced unavailability of modelled equipment if applicable for the concerned time-frame (#028).
GLDPM	45	17	2	innogy welcomes the positive evolution introduced following the first consultation, as far as TSOs have deleted the possibility for TSOs to sanction stakeholders for "*insufficient data quality*". The new wording of article 17.2 seems much more balanced and appropriate, as far as from now on, the TSO "*shall in the first instance attempt to resolve these problems directly with the entity concerned*".

(...) thanks a lot for the opportunity to point out factual errors in your reply to the consultation of CGMMv2 as well as GLDMv2. In fact, we as innogy SE believe that your reply to our comments CGMM-v2_comment_009 and GLDPM-v2_comment_013 is based on an factual (as well as procedural) error. Your reply and justification is based on Article 2(3) of Directive 2009/72/EG [sic! Should be 'EC'], which defines the term 'transmission'. This is, from our point of view, a factual error in form of a misinterpretation or at least a misunderstanding due to the following two reasons:

1. The definition only clarifies what 'transmission' means, it does not define the minimum elements of a transmission system.

2. Considering Article 2(5) of Directive 2009/72/EC, which defines the term 'distribution', we could as well argue that HV systems form distribution systems (to cite it: ("'distribution' means the transport of electricity on high-voltage, medium-voltage and low-voltage distribution systems with a view to its delivery to customers, but does not include supply;").

Obviously, your statement "at a minimum, the transmission system encompasses the high-voltage grid." cannot be justified by 2009/72/EC. As every directive, 2009/72/EC leaves some questions open for national implementation by the national legislator. Neither ENTSO-E nor any TSO is empowered to harmonize subjects which were intentionally left to the national legislators in a directive of the European Parliament and Council!

We would therefor warmly welcome if you could either amend your document in a way to avoid further, unforeseen amendments to European law you are not empowered to or provide a plausible justification for your rejection of our request for amendment.

Please don't hesitate to contact us in case you see the need to engage and discuss the matter directly with us. We are always delighted by a chance to discuss matters directly in physical meetings, as this provides the opportunity to avoid misunderstandings and come to consensual agreements.