An Coimisiún um Rialáil Fóntais
Commission for Regulation of Utilities

All interested parties,
Stakeholders in Ireland and beyond,
and other regulatory bodies

Ref: D/20/17984

Date: 15 September 2020

To whom it may concern,

CRU Decision to Approve the applicability and scope of data exchange under KORRR in accordance with Article 40(5) of SOGL

Article 40(5) of Commission Regulation (EU) 2017/1485 of 2 August 2019 establishing guideline on electricity transmission system operation (SOGL) requires that the TSOs, in coordination with the DSOs and significant grid users (SGUs) shall determine the applicability and scope of data exchange based on Key Organisational Requirements, Roles and Responsibilities (KORRR) in accordance with the SOGL.

On 2 May 2019, the Commission for the Regulation of Utilities (CRU) received a submission from the Irish TSO, EirGrid, which was developed in coordination with the Irish DSO, ESBN. This submission set out their approach to compliance to KORRR under Article 40(5) of the SOGL.

The Commission for the Regulation of Utilities (CRU) is the designated regulatory authority required to issue an approval under Article 6(4)(b) of the SOGL and as such, this letter sets out the CRU's Decision to approve the TSO's submission in relation to the Applicability and Scope of Data Exchange under KORRR.

Background

Article 40(6) of the SOGL required all TSOs to agree on KORRR relating to data exchange. The all TSO proposal on KORRR was agreed upon and approved by All Regulatory Authorities on 19 December 2018.

This document serves as the basis for the contents of the scope of data exchange required under Article 40(5). Under this requirement, each TSO in coordination with relevant DSOs and SGUs are to determine the applicability and scope of data exchange based on the following criteria;

(a) Structural data in accordance with Article 48 of the SOGL;
(b) Scheduling and forecast data in accordance with Article 49 of the SOGL;
(c) Real-time data in accordance with Articles 44, 47, and 50 of the SOGL; and
(d) Provisions in accordance with Articles 51, 52, and 53 of the SOGL.

EirGrid and ESBN consulted on the KORRR to engage with SGUs in early 2019. This consultation closed in February of 2019, and a position paper was published, entitled 'SGU KORRR Position Paper Ireland'. This position paper is to be followed by an SGU KORRR Decision Paper from the SOs, following Regulatory Approval of the applicability and scope of data exchange submission under Article 40(5) of the SOGL, set out here.

Both the position paper and the submission under Article 40(5) of the SOGL were provided to the CRU by EirGrid on 2 May 2019. Under Article 6(4)(b) the CRU is required to approve the submission which relates to Article 40(5) of the SOGL.

Decision

EirGrid's submission under Article 40(5) highlighted that the current data exchange practices are already largely aligned with the KORRR. As a result, the positions reflected in their submission align with the current practices and the requirements of the Grid Code, Distribution Code and other TSO and DSO processes and procedures.

The CRU, however, had some additional questions on the submission and replied to EirGrid and ESBN on 10 July 2020. The questions raised and the answers received from the system operators are provided below.

- Question 1: Scheduled and structural data are not defined explicitly in the Grid Code or Distribution Code, are the TSO and DSO content that all types of structural and scheduled data outlined in the SOGL are contained in the Distribution or Grid Code?
    - ESBN confirmed that they can map the data to the categories in the Distribution Code. They also confirmed that instruments such as the NC5 generator application form may be the primary source of communication of data requirements from the generator to the relevant system operator, and additionally instruments such as signal lists convey more technical data requirements than the Distribution Code.
    - EirGrid was also confident to confirm that all types of data outlined in the KORRR under the SOGL were covered in the Distribution and Grid Codes.
- Question 2: It was requested that the submission under Article 40(5) was updated to explicitly reflect the Position Paper for implementing SGU KORRR relating Data Exchange in accordance with Article 40(6), such that the requirement and criteria for SGUs to provide updated structural information to the TSO or DSO to which they are connected was stated in the submission as well as the Position Paper.
    - The updated submission reflects the request under Section 3.1 paragraph 3.
- Question 3: Clarification was requested on how the Distribution Code would be updated to capture scheduled data requirements.
    - EirGrid and ESBN confirmed that a modification will be brought forward by the TSO to amend the Distribution Code in include these data requirements before the end of 2020.
- Question 4: The CRU questioned whether the Outage Request Form had been developed to enable generators to notify the TSO and DSO of outages at the same time.
    - ESBN confirmed that this form has been developed and is currently in use for transmission connected generators and will be available for distribution connected generators following the implementation of the modification referred to in the answer to Question 3.
- Question 5: Since the time of the submission, ACER had approved their Decision with respect to the Coordinated Security Analysis Methodology required under Article 75 of the SOGL. It was requested that the text in the submission was updated to reflect this Decision.

  - EirGrid updated the text in Section 3.3 under the subheading Article 44 to reflect this request.

- Question 6: Clarification was requested that the System Operators were confident that the current practices are sufficient to comply with KORRR, but as telecommunication technology develops, changes that may be required in the future for real-time data provisions could be captured in respective DSO and TSO Processes.
  - ESBN confirmed that depending on the nature of the technology change that changes in DSO processes would be able to capture the detailed material changes and changes to the Distribution Code would be more appropriate to capture high-level changes.
- Question 7: Clarification was requested on where in the Distribution Code, Grid Code and DSO signals list the detailed content of real-time data was housed, and furthermore on where the term 'refresh-rate' from the KORRR was translated into the relevant Codes.
  - ESBN confirmed that the Distribution Code does have requirements for the holding of real-time data, however they highlighted that the Distribution Code may be too high-level of a document to store such requirements and that there is a longer-term intent to resolve these considerations.
  - EirGrid clarified that Section CC.12.4 of the Grid Code is where the information requested could be located.

Following the response to these questions, an updated submission under Article 40(5) reflecting these comments was submitted to the CRU on 3 September 2020.

The CRU is content with the answers received on the queries as well as the updated submission, and in line with Article 6(4)(b), the CRU is approving the TSO's submission on the applicability and scope of data exchange in accordance with key organisational requirements, roles and responsibilities under Article 40(5).

Next Steps

In accordance with this Decision, the TSO is required to publish the approved submission on the applicability and scope of data exchange under key organisational requirements, roles and responsibilities which is provided in the annex of this Decision on the internet as required by Article 8 of the SOGL.

Furthermore, as detailed in the submission, it is expected that the TSO and DSO will publish an SGU KORRR Decision Paper, which will finalise their positions with regards to SGU coordination under the KORRR.

If you have any queries regarding the information contained within this letter, please contact Heather Pandich at hpandich@cru.ie.

Yours sincerely,

John Melvin
Director Energy Markets and Smart Metering