

ENA Open Networks ECR Change Request Notice – DCUSA Party Comments

Date Received	Company	Comments
22/07/2024	Northern Powergrid	<p>Thank you for the opportunity to comment on the request to change the ECR. We always greatly appreciate suggestions that enables us to make information more accessible for our stakeholders to assist in their decision making. As a company, we make every effort to improve the transparency of our data to empower stakeholders both locally and in the wider electricity distribution community. At Northern Powergrid, we strive to provide the most granular and up-to-date data products we can, and we would support any changes that may better serve the thousands of people who use our use our data regularly.</p> <p>Currently, we are developing a common information model (CIM) for LTDS as per new direction from Ofgem (please see further details here: Long Term Development Statement direction Ofgem). This process involves a 3-Stage incremental implementation of CIM LTDS, where we will be delivering Stage 1 outcomes (Equipment LTDS profile) by Nov 2024; Stage 2 and 3 will be delivered in May 2025 and Nov. 2025, respectively.</p> <p>As a part of Stage 2 delivery the LTDS Connectivity Nodes will be assigned with identifiers which refers to ECR entries for connected and accepted-to-connect generation. Further in Stage 3, we will provide Difference Models representing development projects whose identifiers will be used in Embedded Capacity Register (ECR) entries to indicate projects on which an accepted-to-connect generation connection depends. We believe that provision of these planned CIM models satisfies the objectives of the ECR change request albeit in a different format.</p> <p>Whilst we are open to this proposed change to the content of the ECR, we have some queries to ensure that the changes made are fit for purpose and provide the most value to the end user. Greater clarity is required on the definition of what is required and where the new item is to be added. Currently the LTDS Appendix 3 document (which can be found here: LTDS Appendix 3 - Circuit Data — Open Data Northern Powergrid (opendatasoft.com)) contains a list of nodes as is mentioned in the change request. Would integrating this list of nodes into the ECR be sufficient to fulfil this request? If so please be advised that this data only exists for the EHV network and may take time to create the linkage between these documents. Before we could agree to any proposed changes, we would require a rigorous definition of point of connection (for example LTDS Appendix 3 Node Name 2) then it would be useful to see a draft of the new ECR table to ensure complete coherence between the request and our result.</p> <p>We look forward to hearing your response to these queries and hope it leads to added value for all users of our ECR.</p>

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24/07/2024	National Grid	<p>Please see our response to this change request, which we believe will require further discussion and clarification.</p> <ul style="list-style-type: none"> • This change needs to consider whether the value of adding this data is justified given the additional costs on DNOs to add LTDS nodes to the ECR which could require a significant portion of work. • Adding this data allows this dataset to be combined with LTDS data and therefore could increase the sensitivity of both LTDS and ECR datasets and therefore the cyber security risks need to be considered. • The scope of the ECR extends beyond the scope of the LTDS. The LTDS includes the 132kV network to the lower voltage busbars of primary substations, whereas the ECR is not limited by voltage. • This change needs to be considered alongside changes arising from other workstreams, including reforms to the LTDS. • There are considerations relating to network equivalence if the intention is to use this additional data to model generators using the LTDS network. • The ECR includes the full contracted and accepted pipeline for generator connections, however this does not align to the LTDS and raises the question of how to map ECR entries to network nodes that aren't present in the LTDS model. <p>While we see the value of this proposal, our view is that this needs to be aligned to the LTDS reform timeline.</p>
24/07/2024	SSEN	<p>Many thanks for the opportunity to review & comment on this ECR Data Item Change Request.</p> <p>I have discussed this with my colleagues who are responsible for the Scottish Hydro Electric Power Distribution plc (SHEPD) and Southern Electric Power Distribution plc (SEPD) Embedded Capacity Registers (ECR) and Long Term Development Statements (LTDS) .</p> <p>In principle we think this would be a worthwhile Data Item Change. We note that linking these two files (ie ECR & LTDS) is included in the Form of Direction for the LTDS, which is forecast to be implemented on 1 April 2025. We assume that the DCUSA Panel will include this in its considerations when deciding this ECR Data Item Change Request.</p> <p>We would be happy to participate in a Working Group, if one is established, to progress this. Of course it may be that the pragmatic approach is for the DCUSA Panel to approve this ECR Data Item Change, and to review the linking once the LTDS FoD is implemented?</p>