

How the NRAs' amendment request was incorporated into the Common Grid Model Methodology This version: 21 February 2017

In the summer of 2016, all TSOs submitted the Common Grid Model Methodology (CGMM) to all regulatory authorities for approval under Regulation 2015/1222 ("CACM Guideline"). Stakeholders had earlier been consulted on these documents and the public consultation included a workshop held at ENTSO-E Secretariat on 18 February 2016.

On 13 December 2016, a joint "All NRAs" request for amendment was agreed at the Energy Regulators' Forum. The relevant passage of the request for amendment reads as follows:

"Based on the above rationale, All Regulatory Authorities agree to request an amendment to the CGMM Proposal. This amendment should contain the following elements:

1. All TSOs should remove the CGM deadlines.
 - a. All TSOs should amend the description of the merging process to make clear that all TSOs must complete the merging process and the CGM in time to allow delivery of the day ahead and intraday operational deadlines required by Regulation 2015/1222 and its relevant methodologies.
 - b. In addition, the description must make clear that all TSOs must complete the merging process and CGM in time to allow delivery of the most accurate and up to date model possible for the purposes of capacity calculation in each timeframe.
2. All TSOs should remove the description on agreed measures in Articles 22 and 23 of the CGMM which anticipates the methodologies pursuant to Articles 20(2) and 35(1) of Regulation 2015/1222.
3. All TSOs should not mention that the entity ENTSO-E shall implement and administer the information platform nor that the ENTSO-E shall develop a governance framework for the information platform."

The present note (which was prepared by the CGMM drafting team following the "All TSOs" vote on approval of the amended CGMM for submission to the competent regulatory authorities and was thus not voted on by "All TSOs") outlines how the NRAs' request for amendment was implemented. All Article references refer to the amended CGMM which shall be submitted in two versions:

- With changes clearly tracked in the document (file name: CGMM-2016-05-27-1400h_WP-1_v04.pdf)
- With all changes accepted (file name: CGMM-2016-05-27-1400h_WP-1_v04_all_changes_accepted.pdf)

1. All TSOs should remove the CGM deadlines.

This modification was implemented in Article 22 ("CGM Process"). We note, however, that the CGMM will have to be revised in order to incorporate the requirements of the (currently draft) Commission Regulation (EU) .../... of XXX establishing a guideline on electricity transmission system operation which in Articles 67 and 70, respectively, explicitly requires the incorporation of deadlines for the CGM process.

- a. All TSOs should amend the description of the merging process to make clear that all TSOs must complete the merging process and the CGM in time to allow delivery of the day ahead and intraday operational deadlines required by Regulation 2015/1222 and its relevant methodologies.
- b. In addition, the description must make clear that all TSOs must complete the merging process and CGM in

time to allow delivery of the most accurate and up to date model possible for the purposes of capacity calculation in each timeframe.

This modification was implemented by inserting Article 22(3).

2. All TSOs should remove the description on agreed measures in Articles 22 and 23 of the CGMM which anticipates the methodologies pursuant to Articles 20(2) and 35(1) of Regulation 2015/1222.

This modification was implemented by

- deleting a brief passage in Article 20
- completely removing Article 22 in the original version of the CGMM and
- deleting passages in the (new) Article 22 clearly marked in the amended document.

We note that the amendment request did not ask TSOs to completely avoid using the term "agreed measures". It is essential that the remaining references to "agreed measures" be retained in the CGMM and not be removed or transferred to other methodologies. The reason for this is that it must be absolutely clear from the CGMM that CGMs have to reflect "remedial actions agreed to be implemented based upon a common grid model" (which is the definition of "agreed measures"). Thus if remedial actions are agreed on the basis of a common grid model, TSOs need to be obliged to include these in their IGMs [Article 4(4)] and the merging agents have to ensure that these are included in the resulting CGM [Article 20(1)(f), Article 22(2)(e)(i)]. This requirement needs to be stated in the CGMM proper and not in any other methodology.

3. All TSOs should not mention that the entity ENTSO-E shall implement and administer the information platform nor that the ENTSO-E shall develop a governance framework for the information platform.

This modification was implemented by revising Article 21 and Article 24 accordingly.

Additional changes not explicitly requested by the NRAs

Minor additional changes were required in order to ensure the consistency of the revised document. For example, as Article 22 in the original version of the CGMM was completely removed, cross-references to Articles 22 et seq in the original version needed to be updated. All of these additional changes are also clearly marked as "tracked changes".