

SQSS Industry Consultation Response Proforma

GSR010 – Onshore Entry Criteria

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **17 August 2012** to the SQSS Review Panel Secretary, James Cooper, at james.cooper3@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the SQSS Review Panel when it makes its recommendation to the Authority.

These responses will be published on the National Grid website and included in the Modification Report which is drafted by the SQSS Review Panel and submitted to the Authority for a decision.

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Company Name:	<i>SHE Transmission</i>

Industry Consultation Questions

<p>Do you believe that the proposal better facilitates the proposed Applicable SQSS Objectives / existing SQSS Principles? Please include your reasoning.</p>	<p><i>For reference, the proposed Applicable SQSS Objectives are:</i></p> <ul style="list-style-type: none"> <i>(i) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;</i> <i>(ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;</i> <i>(iii) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and</i> <i>(iv) facilitate electricity Transmission Licensees to comply with their obligations under EU law.</i> <p><i>The SQSS Principles are:</i></p> <ul style="list-style-type: none"> <i>(i) development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission;</i> <i>(ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System; and</i> <i>(iii) facilitating effective competition in the generation and supply of</i>
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	<i>electricity</i>
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Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.

1) SHETL are of the opinion that some form of economic assessment should be taken into account when determining generation connection arrangements. This is particularly important in SHETL's area where there are significant volumes of renewable generation connected in remote locations to radial 132kV networks. This is primarily the reason behind SHETL's SQSS modification request which started the original Work Group 2 investigations.

2) SHETL therefore support the methodology being proposed within the report presented by the Transmission Entry Working Group. In particular, SHETL agrees with the introduction of a set of transparent deterministic rules which are underpinned by cost benefit analysis, as a basis to determine the connection arrangement for different types and sizes of generation.

3) SHETL believes these proposals fit with the SQSS objectives/principals.

4) SHETL agrees that the proposals generally reflect the sort of connection arrangements presently being offered to renewable developers under the current rules and customer choice options. However, the proposals give developers more clarity on the type of connection that is appropriate for their generation scheme, while protecting their rights to vary.

5) One aspect of the proposals which SHETL would ask to Working Group to give further consideration to is the situation where multiple embedded generators are connected to a Grid Supply Point (GSP) or a group of GSPs . In this case the Section 2 criteria may indicate a non-firm arrangement with two transmission circuits of 50% capacity (say connection method 4). This implies that for the loss of one transmission circuit there is a post fault action required to secure the remaining circuit. SHETL's query is related to the costs associated with this post fault action (ie who pays and is it economic relative to the benefit achieved) and whether it is practicable to send the necessary signals to the multiple and sometimes remote embedded generators to initially trip and then to communicate when they can safely reconnect.

While there should be no discrimination between the size of generation involved and whether it is transmission or distribution connected, it should be recognised that there are technical and cost implications to be considered under the scenario presented. Consequently, would the cost and technical issues associated with implementing a post fault generation management system for the scenario presented change the proposed connection arrangement for a GSP or group of GSPs from method 4 (non-firm) to method 5 (firm)?

<p>Minimum System Connections for Generation Connections – do you agree that the proposed modification meets the principles and/or objectives of the SQSS?</p>	
<p>Minimum System Connections for Generation Connections – do you have any comments on possible commercial implications that you would wish the CUSC Panel to take into consideration? Which CUSC option would be preferable - redefine when compensation should be paid (but with potentially higher TNUoS) or maintain the existing arrangements?</p>	
<p>System Resilience for generation at single circuit risk – do you agree that the proposals are appropriate and satisfy the principles and/or objectives of the SQSS?</p>	
<p>Revision of Selected Definitions - do you agree that the proposed modification provide clarity and better meets the principles and/or objectives of the SQSS?</p>	

Standard Connection Schemes - do you agree that the proposed modification provide useful guidance and transparency and satisfy the principles and/or objectives of the SQSS?	
Location of Grid Entry Points – are you satisfied that the proposals further the principles and/or objectives of the SQSS?	
Do you have any other comments?	