CUSC Modification Proposal Form

CMP204

Title of the CUSC Modification Proposal: (mandatory by Proposer)

Consequential to Grid Code Modification D/11 (System to Generator Operational Intertripping Schemes)

Submission Date (mandatory by Proposer)

19th January 2012

Description of the CUSC Modification Proposal (mandatory by Proposer)

This is a consequential Modification Proposal to the Grid Code Proposal D/11 'System to Generator Operational Intertripping Schemes' 1.

This Modification Proposal seeks to amend the CUSC to ensure that the System to Generator Intertripping schemes which use the relevant Transmission Owner's circuit breakers are included. This modification is intended to clarify current business practice and to improve understanding of the 'System to Generator Operational Intertripping' section of the CUSC.

Description of Issue or Defect that CUSC Modification Proposal seeks to Address: (mandatory by Proposer)

D/11 was raised as a result of an Ofgem recommendation within a decision letter for Grid Code Consultation F/08 – 'Grid Code Requirements for System to Generation Operational Intertripping Scheme'², which stated "We consider that NGET should undertake a further review of the system-to-generator operational intertripping scheme descriptions and requirements in the Grid Code in parallel with the implementation of the proposed offshore transmission regime."

D/11 seeks to modify the Grid Code definition of a system to generator operational intertripping scheme. This aims to clarify that such schemes can employ either the User's circuit breakers or the relevant Transmission Owner's circuit breakers to ensure that the Grid Code is consistent with how System to Generator Operational Intertripping Schemes have been implemented for generators connected to relevant Transmission Licensees systems. Grid Code D/11 is currently waiting to be sent to the Authority until the progress of this CUSC Modification Proposal is determined.

The current CUSC drafting assumes that the System to Generator Operational Intertripping schemes only employ the 'User's' circuit breaker(s) whereas it has been found that this is not always the case, with recent examples both onshore and offshore. National Grid has previously used the relevant Transmission Owners circuit breaker which may be confusing for users because the CUSC states that the user's circuit breaker will be used. As this modification is consequential to the Grid Code modification D/11 which seeks to clarify the definition of Intertripping schemes, there will be an inconsistency between the codes if D/11 is approved.

This defect within the CUSC was also identified by a response from EDF Energy to Grid Code consultation D/11 which stated "You may care to consider raising a housekeeping change to the CUSC to amend these clauses, in a similar manner to D/11 to encompass current practice by allowing for the possibility of use of the relevant Transmission Owner's circuit breaker, where this has been agreed as between the user and the relevant Transmission Owner."

This response highlighted that the CUSC includes clauses on intertripping schemes referring to the

¹ This is the link to Grid Code Consultation D/11 'System to Generator Operational Intertripping Schemes' http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/

² This is the link to Grid Code Consultation F/08 'Grid Code Requirements for System to Generation Operational Intertripping Scheme' http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/2008/

User's circuit breaker only specifically in sections 4.2A.4 (c), 4.2A.2.2 (c)and (d), 4.2A.3, 4.2A.4 (b)(i)and (c), 4.2A.5 (d). These paragraphs are within the 'System to Generator Operational Intertripping' part of Section 4: Balancing Services of the CUSC, which we have reviewed and agree that these will require amending if D/11 is approved.

If implemented, this modification would amend clauses within Section 4 of the CUSC ('Balancing Services') in relation to 'System to Generator Operational Intertripping'. This would make it clear that the relevant Transmission Owner's (TO) circuit breaker(s) or the user's circuit breaker may be utilised in an Intertripping scheme when agreed with National Grid, the User and the TO during its connection. As this change is consequential to the Grid Code Proposal D/11, this will ensure that the Grid Code and CUSC will be kept consistent. It will also improve the clarity of the System to Generator Operational Intertripping schemes and therefore better facilitates industry understanding of the statements within the CUSC.

Impact on the CUSC (this should be given where possible)

Changes are proposed to the following sections of the CUSC:

Section 4: Balancing Services (specifically paragraphs 4.2A.2, 4.2A.3, 4.2A.4 and 4.2A.5)

Do you believe the CUSC Modification Proposal will have a material impact on Greenhouse Gas Emissions? Yes/No (assessed in accordance with Authority Guidance - see guidance notes for website link)

No
Impact on Core Industry Documentation. Please tick the relevant boxes and provide any supporting information (this should be given where possible)
BSC
Grid Code
STC
Other (please specify)
None
Urgency Recommended: Yes / No (optional by Proposer)
No
Justification for Urgency Recommendation (mandatory by Proposer if recommending progression as an Urgent Modification Proposal)
Self-Governance Recommended: Yes / No (mandatory by Proposer)
No
Justification for Self-Governance Recommendation (Mandatory by Proposer if recommending
progression as Self-governance Modification Proposal)

Should this CUSC Modification Proposal be considered exempt from any ongoing Significant Code Reviews? (Mandatory by Proposer in order to assist the Panel in deciding whether a Modification Proposal should undergo a SCR Suitability Assessment)

The Modification should have no impact or crossover on the current SCR on Project Transmit.
Impact on Computer Systems and Processes used by CUSC Parties: (this should be given where possible)
None
Details of any Related Modification to Other Industry Codes (where known):
Grid Code Amendment D/11. Following the conclusion of a previous Grid Code Amendment, F/08, relating to the technical requirements that form part of a system to generator operational intertripping scheme, National Grid was asked by the Authority to review the intertripping scheme descriptions in the Grid Code. As a result Grid Code amendment D/11 was proposed to amend the definition of "System to Generator Intertripping" so that scheme which use the relevant Transmission Owner's circuit breakers are included, where all relevant parties have agreed this solution.
This CUSC Modification proposal is consequential to Grid Code Amendment D/11
Justification for CUSC Modification Proposal with Reference to Applicable CUSC Objectives:
(mandatory by proposer) Please tick the relevant boxes and provide justification:
(a) the efficient discharge by The Company of the obligations imposed upon it by the Act and the Transmission Licence
Assuming that Grid Code Modification D/11 will be implemented, this proposal better facilitates Objective (a) as it provides clarification that a generator may be tripped by an intertrip signal to a transmission licensee owned circuit breaker. This will ensure that the System to Generator Operational Intertripping schemes are operated in the most efficient manner
(b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.
The proposal facilitates Objective (b) as it improves clarity of the 'System to Generator Operational Intertripping schemes' and therefore better facilitates industry understanding of the statements which will better facilitate competition.
(c) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.
This proposal is neutral under applicable CUSC Objective (c)
These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1

Details of Proposer: (Organisation Name)	National Grid Electricity Transmission PLC.
Capacity in which the CUSC Modification Proposal is being proposed: (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party

Details of Proposer's Representative:

Name: Jade Clarke

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Attachments (Yes/No):

If Yes, Title and No. of pages of each Attachment:

Yes.

CUSC Section 4 Balancing Services – SYSTEM TO GENERATOR OPERATIONAL

INTERTRIPPING. 4 Pages

4.2A SYSTEM TO GENERATOR OPERATIONAL INTERTRIPPING

4.2A.1 Application

The provisions of this Paragraph 4.2A shall apply to **The Company** and a **User** in respect of the provision by that **User** to **The Company** of **System to Generator Operational Intertripping** where details of a **System to Generator Operational Intertripping Scheme** are set out in Appendix F3 of the relevant **Bilateral Agreement**.

4.2A.2 Provision of System to Generator Operational Intertripping

- 4.2A.2.1 Each User hereby agrees, as between The Company and that User, to:-
 - (a) (save where Force Majeure applies) make available its System to Generator Operational Intertripping Scheme for arming at all times when Active Power is being exported to the National Electricity Transmission System from the Connection Site at which such System to Generator Operational Intertripping Scheme is located;
 - (b) arm, or permit the arming of, the System to Generator Operational Intertripping Scheme in accordance with the terms of the relevant Bilateral Agreement when instructed by The Company (in accordance with Grid Code BC 2.8) by telephone (such instruction to be confirmed by facsimile substantially in the form set out in Schedule 3, Part I to this Section 4);
 - (c) (where an instruction from **The Company** has been confirmed by facsimile in accordance with Paragraph 4.2A.2.1(b) above) following the tripping of the User's Circuit Breaker(s) upon receipt of a signal from the System to Generator Operational Intertripping Scheme:-
 - (i) restrict the export of **Active Power** from the **Connection Site** to the **National Electricity Transmission System** to the level of MW specified in such facsimile confirmation (or such increased level(s) as **The Company** may subsequently notify pursuant to Paragraph 4.2A.2.2(c)(i)) ("the **Restricted MW Export Level**"); and
 - (ii) maintain such restricted export until such time as the **User** is notified by **The Company** in accordance with Paragraph 4.2A.2.2(c)(ii) that the **Restricted MW Export Level** no longer applies, whereupon the **User** shall be permitted to increase the export of **Active Power** from the **Connection Site** above the **Restricted MW Export Level**;
 - (d) comply with any special instructions given by **The Company** in the performance of its obligations under Paragraph 4.2A.2.1(c); and
 - (e) disarm the **System to Generator Operational Intertripping Scheme** when instructed by **The Company** (in accordance with **Grid Code** BC2.8) by telephone (such instruction to be confirmed by facsimile substantially in the form set out in Schedule 3, Part I to this Section 4).

4.2A.2.2 **The Company** hereby agrees to:-

notify the **User** as soon as reasonably practicable following **The Company** becoming aware of the requirement for arming of the **System to Generator Operational Intertripping Scheme**;

- (b) (where relevant) take any steps necessary to arm the System to Generator Operational Intertripping Scheme in accordance with the terms of the relevant Bilateral Agreement;
- (c) following the tripping of the User's Circuit Breaker(s) upon receipt of a signal from the System to Generator Operational Intertripping Scheme, notify the User:-
 - (i) as soon as the **Restricted MW Export Level**, whilst still applying, can be increased; and/or
 - (ii) as soon as the **Restricted MW Export Level** (as may be increased from time to time pursuant to (i) above) no longer applies

each such notification to be in accordance with **Grid Code** BC 2.8 and to be made by telephone (such notification to be confirmed by facsimile substantially in the form set out in Schedule 3, Part II to this Section 4); and

(d) issue an instruction to disarm, referred to in Paragraph 4.2A.2.1(e), as soon as reasonably practicable following The Company becoming aware that the requirement for arming of the System to Generator Operational Intertripping Scheme has ceased (and such an instruction shall be deemed to have been issued for the purposes of this Paragraph 4.2A upon tripping of the User's Circuit Breaker(s) upon receipt of a signal from the System to Generator Operational Intertripping Scheme).

4.2A.3 Intertrip Volume

Following the tripping of a User's Circuit Breaker(s) following receipt of a signal from a System to Generator Operational Intertripping Scheme, the resulting reduction in Output for each tripped BM Unit i or (where relevant) any tripped Generating Unit(s) comprised in a BM Unit shall be determined in accordance with the relevant formula set out in the ABSVD Methodology Statement, where such resulting reduction in Output is termed SEsi.

4.2A.4 Payments to the User

The Company shall make the following payments to the User in respect of System to Generator Intertripping Schemes:

- (a) a Capability Payment shall be paid in respect of each Category 2 Intertripping Scheme and each Category 4 Intertripping Scheme as follows:-
 - (i) The Company shall pay to the User an amount ("the Capability Payment") in consideration of the installation of the System to Generator Operational Intertripping Scheme and the User's obligations under Paragraphs 4.2A.2.1(a) and (b), being an amount per month determined by reference to the number of Settlement Periods during the month in question (and in respect of which the requirement for System to Generator Operational Intertripping is stated in Appendix F3 of the relevant Bilateral Agreement) and the payment rate (£/Settlement Period) specified in Schedule 4 to this Section 4; and
 - (ii) for the avoidance of doubt, where a System to Generator
 Operational Intertripping Scheme comprises both a
 Category 2 Intertripping Scheme and a Category 4

Intertripping Scheme, only one Capability Payment shall be payable by The Company to the User in respect thereof;

- (b) subject always to Paragraph 4.2A.5, a Restricted Export Level Payment shall be paid in respect of each Category 2 Intertripping Scheme, each Category 3 Intertripping Scheme and each Category 4 Intertripping Scheme as follows:-
 - (i) the payment shall only be made where, following the tripping of the User's Circuit Breaker(s) upon receipt of a signal from the System to Generator Operational Intertripping Scheme, restrictions on the export of Active Power from the Connection Site apply in accordance with the terms of Paragraph 4.2A.2.1(c) above at any time after the period of 24 hours has elapsed following such tripping; and
 - (ii) in such a case, **The Company** shall pay to the **User** upon request the **Restricted Export Level Payment**, by reference to the period from expiry of such 24 hour period until the time when **The Company** notifies the **User** in accordance with Paragraph 4.2A.2.2(c)(ii) that the **Restricted MW Export Level** no longer applies ("the **Restricted Export Level Period**"); and
- (c)subject always to Paragraph 4.2A.5, in respect of each Category 2 Intertripping Scheme and Category 4 Intertripping Scheme, where the User's Circuit Breaker(s) are tripped upon receipt of a signal from the System to Generator Operational Intertripping Scheme, The Company shall pay to the User an amount ("the Intertrip Payment") being an amount (£/Intertrip Contracted Unit/trip) specified in Schedule 4 to this Section 4.

4.2A.5 Withholding of payments

The Company shall not be obliged to make any Restricted Export Level Payment or Intertrip Payment pursuant to Paragraph 4.2A.4 where the tripping of BM Unit(s) or (where relevant) Generating Unit(s) comprised in a BM Unit occurs:-

- during any period where the **System to Generator Operational Intertripping Scheme** is not instructed by **The Company** to be armed in accordance with Paragraphs 4.2A.2.2(a) and 4.2A.2.2(d); and/or
- (b) where the **User** has failed to arm, or permit the arming of, the **System to Generator Operational Intertripping Scheme** in accordance with the terms of Paragraph 4.2A.2.1(b); and/or
- (c) where the **User** has failed to exercise **Good Industry Practice** to restrict the export of **Active Power** from the **Connection Site** to the **Restricted MW Export Level** as required by Paragraph 4.2A.2.1(c) (ignoring any export above **Restricted MW Export Level** where pursuant to an instruction from **The Company** to provide any **Balancing Service**(s)); and/or
- (d) where no signal is received by the User's Circuit Breaker(s) from the System to Generator Operational Intertripping Scheme.

4.2A.6 Revisions to Appendix F3 of the Bilateral Agreement

Where The Company requires Routine Change(s) (as defined below) to be made to Appendix F3 of the Bilateral Agreement, then the User shall not unreasonably withhold or delay providing to The Company written consent to any such Routine Changes and hereby authorises The Company, following receipt of such written consent, to make amendments on its behalf to Appendix F3 of the Bilateral Agreement to reflect such Routine Change(s) and undertakes not to withdraw qualify or revoke such authority or instruction at any time. For the purposes of this Paragraph 4.2A.6, "Routine Change(s)" shall mean changes to the nomenclature of transmission circuits associated with a System to Generator Operational Intertripping Scheme specified in Appendix F3 of the relevant Bilateral Agreement which do not necessitate replacement, renovation, modification, alteration or construction to the User's Plant or Apparatus.

4.2A.7 No payments for Category 1 Intertripping Schemes

For the avoidance of doubt, no payment shall be made by **The Company** hereunder in respect of a **Category 1 Intertripping Scheme**.