Grid Code Review Panel

Formalisation of Frequency Exclusions Process

Introduction

1. Following the Authorities decision on CUSC Amendment Proposal CAP047 (Introduction of a competitive process for the provision of Mandatory Frequency Response) to be implemented from 1st October 2005, NGC has reviewed the impacts which were also considered as part of the CAP047 working group. NGC believes that it would be appropriate for the Grid Code to formally adopt a process for redeclaring operational frequency capability. This process has already been adopted informally through the exchange of faxes between NGC and Generators to cover shortfall in real time. A similar process is already covered in the Balancing Code for Reactive capability. This change would be lined up with revisions to the MSAs as part of the implementation of CAP047.

Current situation and impact of CAP047

- 2. There has been an informal mechanism in place for many years, managed by NGC, which facilitates the withdrawal of frequency response services from generators in real time.
- 3. Under existing and CAP047 arrangements a situation could be envisaged whereby a unit develops a technical issue that results in a requirement for it to withdraw from the provision of Frequency Response. Formally, the only mechanism that exists (and still enabling the set to run) is through the submission of prices, either in the Balancing Mechanism (Bid and Offer prices) or through CAP047 arrangements. However, under CAP047 prices can only be modified on a monthly basis even if the unit is only unavailable for a matter of hours or a few days.
- 4. NGC do not believe it appropriate that the pricing mechanism under the CUSC (or the BM in existing arrangements) should be used to indicate or manage short term restrictions to frequency response. Such a practice could unduly restrict the volume of response available to the market at certain times and affect the volume of bids and offers realistically available in the balancing mechanism.
- 5. In addition, the existing informal exclusion arrangements have resulted in information being submitted on both a BMU or Unit basis as required. This reflects the existing arrangements in the MSAs. However the MSAs through the Plant Configuration Factor only provide for the situations where a unit is unavailable to deliver its MW capability and assumes that if synchronised all units are capable of delivering frequency response at all times. NGC is proposing to revise the MSAs

on implementation of CAP047 to acknowledge this exclusion process and enable the Plant Configuration Factor to be applied to Frequency Response provision. Therefore NGC is proposing that the exclusion process be adopted as a formal process under the Grid Code.

Proposals

- 6. It is proposed that the informal mechanism managed by NGC currently is formalised through a Grid Code modification. This process would require the generator to send a fax transmission to NGC detailing that the unit is unavailable for operation in Frequency Sensitive Mode giving reasons for the unavailability and a predicted return to service time which would be confirmed by a further redeclaration.
- 7. The legal drafting to support this proposal is attached as Appendix 1. This is based on the existing informal process and the existing drafting for the reactive capability redeclaration process in the Balancing Codes.
- 8. The drafting also contains a clarification that the exclusion process is to reflect operational problems of a limited timescale. In the event that a unit appeared to become unavailable for an extended period through this process NGC may seek to clarify the capability required by the Connection Conditions through the process described in OC5. Should a generator wish to reflect commercial issues in its willingness to carry frequency response this should be reflected through the CUSC commercial processes and not this BC2 process.
- 9. NGC are seeking to proceed to wider industry consultation immediately, with the target of implementation date prior to CAP047 being implemented or as soon as reasonably practicable thereafter.

Recommendation

- 10. The Grid Code Review Panel is invited to:
 - 1) Discuss the proposed formal adoption of the frequency exclusion process in the Balancing Codes,
 - 2) Comment on the legal drafting supplied in Appendix 1,
 - 3) Agree that the proposal is suitably formed to be presented to the wider industry,
 - 4) Endorse the proposal and recommend NGC take it to wider industry consultation

Annex to GCRP Paper 05/08 Proposed drafting for Grid Code text BC2.6.1 ... h) Submissions of revised availability of Frequency Sensitive Mode may be made by facsimile transmission, using the format given in Appendix 4 to BC2. This process should only be used for technical restrictions to the availability of Frequency Sensitive Mode.

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Appendix 4 – Submission of availability of Frequency Sensitive Mode

BC2.A.4.1. For the purpose of submitting availability of Frequency Sensitive

Mode, this process only relates to the provision of response
under the Frequency Sensitive Mode and does not cover the
provision of response under the Limited Frequency Sensitive
Mode.

BC2.A.4.2. The following provisions apply to the faxed submission of the **Frequency Sensitive Mode** availability:

- (a) The fax must be transmitted to NGC (to the relevant location in accordance with GC6) and must contain all the sections relevant to Appendix 4 Annexure1 but with only the data changes set out. The "notification time" must be completed to refer to the time of transmission, where the time is expressed in London time.
- (b) Upon receipt of the fax, NGC will acknowledge receipt by sending a fax back to the User. The acknowledgement will either state that the fax has been received and is legible or will state that it (or part of it) is not legible and will request re-transmission of the whole (or part) of the fax.
- (c) Upon receipt of the acknowledging fax the **User** will, if requested re-transmit the whole or part of the relevant part of the fax.
- (d) The provisions of paragraph (b) and (c) then apply to the re-transmitted fax.
- EC2.A.4.3 The User shall ensure the availability of operating in the

 Frequency Sensitive Mode is restored as soon as reasonably practicable. In the event of a sustained unavailability of Frequency Sensitive Mode NGC may seek to confirm compliance with the relevant requirements in the CCs through the process in OC5.

HRS MINS DD MM YY

Appendix 4 - Annexure1

entire module

To: NGC Transmission Control Centre From: [Company Name and Location]

Submission of availability of Frequency Sensitive Mode

GENERATING UNIT *	
Start Time / Date (if not effective immediately)	
The above unit is unavailable / available to operate in Frequency Sensitive	Mode.
Limited Frequency Sensitive Mode must be maintained.	
Elimited Frequency Schsitive Wode must be maintained.	
Please provided brief description of reason for unavailability of Frequency Sensitive Mode	
Predicted End Time / Date (to be confirmed by re-declaration)	
Re-declaration made by (signature)	

Notification Time

* For a CCGT the re-declaration is for an individual CCGT unit and not the