

## National Grid Electricity Transmission Ltd

**Minutes of the  
Grid Code Review Panel  
AEP Offices, London  
24<sup>th</sup> November 2005**

Member		Alternate		Representing	Observer/Adviser	
Ben Graff	BG			Chair		
David Payne	DP			Secretary		
Mark Duffield	MD			National Grid	Richard Scarth	RS
Rachel Morfill	RM				Richard Wood	RW
Guy Phillips	GP				John Hyde	JH
					Ben Marshall	BXM
Mike Kay	MK			DNO		
		Graeme Vincent	GV			
Dave Carson	DC					
		John Norbury	JN	Generators with Large Power Stations with total Reg. Cap.> 3GW		
John Morris	JM					
Richard Hyde	RH	Campbell McDonald	CMc			
David Ward	DW			Generators with Large Power Stations with total Reg. Cap.< 3GW		
Malcolm Taylor	MT			Gens without Large Power Stations		
Guy Nicholson	GN			Novel Units		
Bridget Morgan	BM			Ofgem		
Chandra Trikha	CT			Relevant Transmission Licensee		
Kathryn Coffin	KC			BSC Panel		

## 1 INTRODUCTIONS

- 316 BG introduced GP (who would be taking John Greasley's place on the GCRP for the next few meetings) and DC who replaced George Spowart as the Scottish DNO representative.

## 2 APOLOGIES FOR ABSENCE

317 Apologies were received from:

- Ian Gray (DNO)
- Stuart Graudus (NEC)
- Claire Maxim (Gens >3GW)
- Jean Pompee (EISO)
- David Nicol (RTO)
- Nasser Tleis (NGET)
- Charlie Zhang (Gens >3GW alternate)
- Neil Sandison (Scottish DNO alternate)

## 3 APPROVAL OF MINUTES OF MAY MEETING (050519drpm)

318 GN and JN noted two minor typographical errors in minutes 254 and 266. With these corrections the minutes of the September meeting were agreed as a true record of the meeting.

## 4 MATTERS ARISING FROM PREVIOUS MEETING (not covered below)

### 4.1 Summary of actions (GCRP 05/25)

319 Action 307 – GP stated that National Grid would report back at the February on its consideration of whether an intertrip standard could usefully be provided.

320 All other Actions were complete or covered by other Agenda Items.

### 4.2 Other Matters Arising.

321 Minute 285 – With respect to Significant Event Reporting GN noted that he had now sent a note to RM raising specific points related to the capture of specific system events and their impacts from a windfarm point of view. In particular GN felt that some improvements could be made to the reporting systems as it was not clear how events were being logged. GN felt that a follow up meeting was now required.

322 **Action** – *RM and GN agreed to discuss the issues outside the meeting.*

323 GN also noted that Gareth Evans (GE) of Ofgem will need to be copied in on the material.

324 Minute 298 – With respect to CAP097 JN requested clarification on the obligations that National Grid was likely to impose on generators as a result of CAP097 (if approved) given that the Grid Code did not generally apply to Small Power Stations. MD noted that only site specific obligations would apply to Small Power Stations.

325 BG noted that the aim of CAP097 was to enable National Grid to determine if certain embedded generators, that National Grid would otherwise have no formal contact with, would impact on the Transmission System. This would enable National Grid to determine if Transmission System reinforcement would be required. Any small generators having such an impact would be captured under CAP097. CAP097 had been drafted to reduce ambiguity and the process would be initiated through the CUSC.

- 326 Refurbishment Plant – JN noted that the Panel had discussed this issue in 2004 and as a result a Grid Code change had been proposed under consultation D/04 to enable National Grid to request testing following refurbishment of control systems. However it now appeared that National Grid required a modification application to be submitted if, for example, a generator wished to change an exciter. Given the low cost of this unit compared to the modification application fee JN asked if National Grid felt this was necessary and reasonable and if so felt that the industry should have been alerted to this requirement earlier. BG responded that the generator should take this up with the relevant Customer Account Manager at National Grid but agreed to seek further information and to report back to the February Panel meeting.
- 327 **Action:** *MD to provide further information to the February Panel on the background to this issue.*
- 328 Minute 308 – System Security. JN raised this issue and MT noted that there was much discussion related to possible events this coming winter. As such the issue needed to be kept open to ensure that the industry was not caught out in the coming months.
- 329 **Action:** *National Grid agreed to include this issue on the Development Issue list.*

## **5 GRID CODE DEVELOPMENT ISSUES (GCRP 05/26)**

### **5.1 Report On Progress Of Consultation Papers (GCRP 05/26Table 1)**

- 330 D/05 – LEEMPS – DP noted that replies to respondents had been sent and the Report to the Authority would be prepared shortly.

### **5.2 Other Issues (GCRP 05/26Table 2).**

- 331 Capacity Terms in the Grid Code – JN asked if it was still relevant for the Grid Code to refer to Generation Capacity given that TEC was introduced with the implementation of CAP043. National Grid agreed to consider this issue. MT suggested that any other possibly redundant terms should be considered at the same time.
- 332 **Action:** *MD to consider the use of Generation Capacity and other possibly redundant terms in the Grid Code.*
- 333 No further comments or issues were raised.

## **6. GOVERNANCE OF ELECTRICAL STANDARDS PROPOSAL (GCRP 05/27)**

- 334 MD went through the paper using slides to illustrate the issues. MD noted that the issue was originally raised under paper GCRP 04/29 which proposed the inclusion of a number of additional NGTS's under the Governance of the Grid Code using the Governance of Electrical Standards route detailed in the General Conditions. National Grid considered the additional NGTS's and proposed that a single document should be prepared containing the relevant sections of the NGTS's quoted which would replace the 18 NGTS's currently referenced.

- 335 A draft Relevant Electrical Standards document had been produced and following agreement at the September 2005 GCRP meeting a consultation with Authorised Electricity Operators had been carried out. Four responses to the consultation had been received which had included comments/amendments on the proposed content and suggestions for the inclusion of additional standards. As a result National Grid had made further changes:
- to clarify that the RES would only apply to England and Wales;
  - to amend National Grid references to NGET;
  - to clarify that the Guidance notes included in the RES did not form part of the RES;
  - to clarify that the RES only applies on a prospective basis in accordance with Grid Code CC.6.2.1.
- 336 National Grid suggested that the proposed RES was a significant improvement on the existing GES documentation and recommended that the new documentation should be adopted. However National Grid recognised the further changes identified in the responses and proposed that these should be taken forward separately to avoid any delay with implementation of the RES.
- 337 GCRP members noted the substantial amount of work carried out by National Grid to prepare the RES and extended their thanks to National Grid. JN noted concern with respect to implementation in particular in relation to standards referenced in existing Bilateral Agreements. JN also expressed concern that the RES only applied to equipment within the busbar protection zone and also that guidance notes were contained within the document which could result in the need for a Grid Code change should a guidance note reference change. MD noted that the Guidance Notes had been labelled as not being part of the RES and thus not subject to the governance rules.
- 338 DW noted that National Grid had included only the England and Wales standards within the RES and asked if there were any plans to include Scottish standards in the future. DN responded that this was not being considered at this time.
- 339 JN noted that a new User connecting to the system would be required to comply with the extant RES but asked if the User subsequently made a modification application to (e.g.) increase TEC by 5MW what would be included in the new agreement. MD responded that this would depend on circumstances and whether the modification application would involve work on assets that would be covered by the RES. If there was no such work then there would be no need to reference NGTS's at all. JN felt that National Grid should provide some guidance on what could be expected to be included in agreements Appendix F5's under various scenarios. MD responded that National Grid would provide such guidance if JN suggested the scenarios.
- 340 **Action:** *JN to provide appropriate scenarios and National Grid to provide guidance on what would be include in associated agreements Appendix F5.*
- 341 JN also asked how the User would reference the version of the RES that existed at the time of the application. MD noted that National Grid would use a version control system and would keep archives of all previous versions of the RES and would give consideration to including appropriate text to indicate this in the Grid Code.
- 342 **Action:** *National Grid to consider associated consequential Grid Code text changes required.*

- 343 JN also expressed concern on the impact on embedded generation given that references to NGTS's were included in BEGA's. JH expected that only NGTS's concerned with metering or monitoring would be included in such agreements and National Grid would provide such equipment anyway. Nothing in the RES applied directly to embedded generators. DW noted that it was possible that some agreements contained incorrect references and suggested that National Grid should be informed where this was the case.
- 344 It was noted that it was not clear in the Grid Code General conditions which standards applied to E&W only and suggested that the General Conditions text should be clarified. GCRP members agreed that the RES document should be implemented as soon as possible noting the suggestions arising in the discussion at the meeting. It was agreed that none of these suggestions needed to hold up the implementation of RES. **Post meeting note:** *National Grid has confirmed an implementation date of the 9<sup>th</sup> January 2006 for the introduction of RES.*
- 345 **Action:** *National Grid to implement RES on 9<sup>th</sup> January and as soon as possible develop Grid Code text changes relating to version control and clarifying application to E&W only.*

## 7. PROPOSAL TO IMPROVE THE CLARITY OF THE DATA REGISTRATION CODE FOR THE DNO/NEC/NGET PLANNING INTERFACE (GCRP 05/28)

- 346 MK noted that following their investigation into EDF's compliance with their licence Ofgem had expressed concern at the differing interpretations of data requirements. The differing interpretation arose out of the annual Week 24 Demand data exchange between DNOs and National Grid and the associated assessment of compliance with P2/5 and the Security and Quality of Supply Standards (SQSS) at the DNO/National Grid interface.
- 347 In addition work had been ongoing to produce P2/6 by modification of P2/5 which would require Ofgem approval. Ofgem has identified a possible inconsistency between the proposed Distribution Code change and standard condition 5 of the distribution licence which it is considering in consultation with DNOs.
- 348 Paper GCRP 05/28 recommended that a working group should be initiated to review the data exchange processes and remove the scope for confusion. Terms of Reference were included that suggested that the working group report back to the February GCRP in order to ensure that any Grid Code changes could be implemented in time for the 2006 week 24 process. It was noted that this issue concerned Non-Embedded Customers (NEC) as well as DNOs given the requirement to address the Planning code and the DRC within the working group scope.
- 349 MT asked for clarification on whether proposed distributed generation would be energised if they had not provided data. MK responded that week 24 submissions from the DNO would include data from relevant generators and this issue would not degrade that interface. The issue was concerned with the interpretation of demand data and the contribution of interconnecting circuits etc.
- 350 CT noted that the User had an obligation to provide demand data to National Grid but noted that where National Grid required the demand at the time of National Grid's peak demand this did not necessarily coincide with the time of the Users

peak demand. BXM also noted that whilst the peak demand may be in the winter for certain sites the period of concern was the seasonal peak in summer, spring and autumn when equipment ratings are lower but demand may not be. Any working group would need to clarify these issues.

- 351 It was noted that the Terms of Reference should include Transmission Owners representatives as members of the group.
- 352 MD noted that should the Panel agree to a working group the first meeting would be scheduled for 5 December at National Grid House.
- 353 Panel members agreed that a working group should be set up to consider the issues. Nominations for inclusion on the working group should be sent to Mark Duffield.

## **8. MANAGEMENT OF 'SYSTEM CONNECTIONS' (GCRP 05/29)**

- 354 RW explained the problem using slides. The Guidance notes for the Electricity at Work Regulations 1989 required that when two systems are defined as readily connectable they should be classified as one system. As such the requirements of Grid Code OC8 would become effective. However when establishing new connections with a third party there was currently no formal process that recognised two systems subject to different safety rules becoming one system. This was because the process of amending HV systems varied between companies with some companies making additions to their systems prior to being declared as part of the whole system. The only control measure in place when adding to or amending the HV system is that the Site Responsibility Schedule takes effect. This would be signed by all parties to confirm accuracy but this could be many weeks in advance of the proposed change and does not clearly define the time and date when the two systems would be classified as one.
- 355 To overcome this National Grid proposed that formal authorisation from all relevant parties should be sought to endorse the final connection being made from a defined time and date. It was proposed to amend the Grid Code Connection Conditions to detail these requirements and amend the Site Responsibility Schedule proforma to clearly define the time and date that the OC8 requirements became effective.
- 356 RW noted that this issue had been discussed with DNO's who had agreed the need for a formal process but had not wanted the introduction of a further form. Therefore the modification to the SRS was proposed. The process had also been discussed with representatives of generators, ScottishPower and SHETL.
- 357 JN expressed concern that the proposed form required an individual to sign the form as Control Person and felt that any signatures should be those of the persons acting as Responsible Managers only. RW noted that the Control Person was only required to sign for the proposed effective date and time of the modifications proposed on the SRS. The Responsible Manager was required to sign the form to agree the actual modifications. MT suggested that for clarity there was a need for written definitions of who can sign such forms on behalf of Responsible Managers. JN also suggested that this process be extended to apply in the even of termination from the transmission system.

- 358 DN expressed concern with the process of getting up to 5 different signatures for the form and such a process needed to be clear. DN also noted that the proposal included only an E&W version of the SRS with no Scottish equivalent included. DN also expressed his concern with the perceived lack of involvement of the Scottish companies in the early stages of the discussion process. RW noted that the intention had initially been to make modifications to the E&W system but ScottishPower and SHETL had now been fully consulted through the STC Committee and its Safety Standing Group.
- 359 BG summarised that there were three concerns:
- Who should sign the SRS
  - How should the signing process be carried out
  - Confusion over the applicability to ScottishPower and SHETL
- 360 BG suggested that to take the issue forward further discussion should take place outside the GCRP. Following this an updated consultation proposal could be developed. MK agreed and requested that any such meeting should include an E&W DNO representative.
- 361 Panel members agreed that a meeting should be convened outside the GCRP comprising National Grid, SPT and SHETL and a DNO to be nominated by MK. GCRP members agreed that any consultation paper arising from this meeting should be circulated to Panel members for comment before being circulated to the wider industry without coming back to the GCRP first, providing Panel members were content that the proposals were ready to proceed to Consultation.

## **9. MANAGEMENT OF 'NO SYSTEM CONNECTIONS' (GCRP 05/30)**

- 362 RW again explained the problem using slides. Grid Code OC8 defines methods of establishing and maintaining safety across control boundaries and the RISSP process records the isolation and earthing established for a third party. Where the third party apparatus is not substantially built there would be no means of providing isolation/earthing to National Grid. In the absence of a better process the current RISSP process had been used to record a 'no system connection'. However the current RISSP does not formally recognise 'no system connection'.
- 363 National Grid proposed that section 1.2 of the RISSP form should be amended to formally recognise the term 'No System Connection'. This had been discussed with Users who had not wanted major changes to the RISSP process but had agreed that section 1.2 should be amended.
- 364 DN suggested that the term Adequate Physical Separation could be used where there was no system connection. RW pointed out that in this case as there was actually no system the term suggested did not apply.
- 365 CMc stated that the process assumed that a RISSP arrangement existed with the system builder. RW noted that the process applied once the system in question has been handed over from the contractor.
- 366 JN asked how the system would prevent misuse. RW stated that the RISSP would be invalidated if new equipment was added and further discussions were required.
- 367 DN felt that the proposal would not work as written in Scotland and again expressed concern on the perceived lack of discussion on the issue with Scottish

parties. BG suggested that further discussions should be held outside the GCRP as with the previous issue. If it was agreed that the proposal was unworkable then it should be brought back to the next GCRP meeting.

368 RW noted that discussion had been held with Scottish parties through the STC committee.

369 Panel members agreed that a similar process to the previous issue should take place i.e. further discussion outside the GCRP, circulation of a draft paper to GCRP members then wider consultation.

#### **10. PROPOSED CHANGES TO BC1/BC2 (GCRP 05/22)**

370 MD stated that the changes proposed in the paper had arisen as a result of an unforeseen interaction between the Generic Provisions modifications and the introduction of Cascade Hydro and EELPS.

371 The EELPS changes in BC1 and BC2 required the provision of data to National Grid on a generating unit basis if required in the Bilateral Agreement. However the definition of Generating Unit includes Power Park Units and so resulted in the requirement for windfarms to provide data at a Power Park Unit level. The Generic Provisions changes had intended that data should be provided at a Power Park Module level. The current Grid Code could therefore be potentially discriminatory when viewed against the equivalent provisions for BM Units. It is also potentially inefficient as National Grid only required data on a Power Park Module basis.

372 National Grid intended to consult on the proposed changes which aimed to resolve this situation.

373 GCRP members generally expressed concern that the proposed text did not seem to address the problem and was difficult to understand.

374 MD stated that the proposed text had been the subject of legal review but invited to Panel members to provide alternative text. MD also undertook to review the text further with National Grid legal.

375 Having taken GCRP comments into account National Grid intended to initiate a wider consultation on the proposed changes.

#### **11. REGIONAL DIFFERENCES WORKING GROUP UPDATE**

376 MD noted that the second meeting of the Regional Differences Working Group had been held on 1 November at Ofgem's offices in Glasgow. At this meeting National Grid, SP Transmission (SPT) and Scottish Hydro-Electric Transmission Ltd (SHETL) had each presented their views on the appropriate levels at which to define Small, Medium and Large Power Stations

377 National Grid had examined the existing definitions and established that aligning all of Scotland to existing England & Wales levels would present very significant operational difficulties. Therefore National Grid's focus had been upon aligning the definitions across Scotland.

- 378 National Grid's concern as GBSO was the ability to despatch Balancing Services in Scotland which was restricted to Large Power Stations. However it was also important to receive operational data (e.g. output levels & Planning Data) from smaller Power Stations especially in the north west of Scotland. National Grid therefore proposed:
- Large:  $\geq 30$  MW
  - Medium:  $< 30$  MW but  $\geq 10$  MW
  - Small:  $< 10$  MW
- 379 SP had examined their system and obligations with a view to harmonisation and established that losing planning data on any Power Station currently classed as Large ( $\geq 30$  MW) was unlikely to be sustainable. SP Transmission also believed that data was not required for Power Stations with a capacity below 30 MW as in practise no information was received currently and no operational difficulties were experienced. Based upon expected future connections the situation is not expected to deteriorate.
- 380 SP Transmission were therefore of the view that the definitions in the SPT area could be amended to:
- Large:  $\geq 30$  MW
  - Small:  $< 30$  MW
  - Medium range could be removed
- 381 SHETL had also examined their system with a view to harmonisation and their initial view was that it would be difficult to move away from the existing definitions
- Large:  $\geq 5$  MW
  - Small:  $< 5$  MW
- 382 The working group had discussed the use of a Medium range as a means to achieve harmonisation. The view of the working group generally was that the contractual framework for Medium Power Stations was so far not fully developed (LEEMPS, CAP097) whereas the BELLA based contractual framework for EELPS is well developed and the use of Medium in SPT area may result in unnecessary obligations being placed upon generators.
- 383 As a result of the discussion the consensus view emerged that achieving significant harmonisation across Scotland would be problematic and it was likely that three separate definitions would be retained for each transmission area.
- 384 At the meeting the following actions were agreed:
- National Grid to summarise Grid Code obligations for Small, Medium and Large Power Stations and to examine whether the "hard-coded" MW compliance thresholds could be relaxed
  - SPT to examine if the Large/Small threshold in their proposal can be raised to above 30 MW
  - SHETL to examine if the Large/Small threshold in their proposal can be raised to 10 MW
- 385 The next working group meeting would be on 6<sup>th</sup> December to be held at National Grid House.
- 386 BM also noted that Simon Cowdroy of ECONNECT had taken an action to consider the effect of the proposals on their constituent members.

387 BG noted that the next meeting would probably be the last before the final paper was prepared for the February meeting. Therefore it would be necessary to ensure that all relevant issues had been covered at that meeting.

388 MT noted that AEP members would be interested in the discussions and asked for National Grids final paper to be circulated as soon as was practical.

## 12. BSC/CUSC MODIFICATION PROPOSALS (GCRP 05/23)

### BSC

389 There was nothing additional to report at the meeting

### CUSC

390 There was nothing additional to report at the meeting

### OTHER

391 In response to a question on the Fuel Security Code, BG noted that the DTI was currently consulting on proposed changes to the Fuel Security Code. It was likely that there would be an impact on the Grid Code. It was agreed that if the review were concluded in time, this issue would be discussed at the next GCRP meeting.

## 13. ANY OTHER BUSINESS

### AOB 1

392 GN noted that following the implementation of the Generic Provisions in the Grid Code Gareth Evans of Ofgem had suggested that an industry review of the situation should be held about six months after implementation. Windfarm developers had felt that six months after implementation for a full review was too soon. However the windfarm community had recently held a seminar and a report would be provided to the GCRP at an appropriate time. However the following points were noted:

- It had been reported that National Grid had held a seminar with wind turbine manufacturers with the aim of encouraging them to provide data to aid the compliance process.
- The Guidance notes for Power Park developers published by National Grid on the website had been welcomed but developers were looking for continuing improvement.
- Timescales for construction associated with windfarms were much shorter than with conventional plant. National Grid was requested to take a flexible approach in the various processes while contractors were becoming familiar with the rules.
- Concerns were expressed with the voltage control and reactive requirements being detailed in Bilateral Agreements. It was felt that as these were generic they could be included in the Grid Code or come under some other governed process. It was noted that the imposition of voltage/reactive ranges on distributed generation by National Grid was not welcomed.

- A discussion/workshop with National Grid was being set up to consider what wind data should be provided and how best to provide it.

#### AOB 2

- 393 MT raised the issue of the Highways Agency's requirement that a special travel permit was required to ship loads weighing above 150 Tonnes and that shipping should be carried out using waterways wherever possible. MT noted that this requirement was applied regardless of cost with the expectation the costs incurred could be passed through to customers. A meeting had been arranged with the Highways Agency and high ranking industry officers to discuss this issue. MT sought support from GCRP members to raise the concerns of how these policies were being applied.
- 394 Several GCRP members noted recent experiences with the application of these policies including similar experiences in Scotland and support was given for the concerns to be raised at the meeting.

#### AOB 3

- 395 MT raised an issue related to the GB Queue process and more widely to the GB sharing process for final sums liabilities. This would normally have been raised at the November CUSC meeting but MT raised the issue here as the November CUSC Panel meeting had been cancelled.
- 396 MT noted that at an Association meeting with the Scottish Renewables forum two points had been raised:
- It had been noted that although National Grid was trying to be helpful and get processes sorted out as soon as possible, policies were being developed, in his view, 'on the hoof'. It was recognised that National Grid was attempting to manage this but it was possible that Users liabilities would vary.
  - Process descriptions were on included in National Grid's internal documentation.
- 397 GP responded that with respect to policy development 'on the hoof', policy was certainly needing to be developed quickly and efficiently. There was a need to get things done as soon as possible so that all parties were sorted out by the next financial year. Also the documentation was available more widely than suggested as there had been a consultation, presentations and conclusions published on the processes. However it was recognised that the situation was less than perfect and National Grid was working to minimise the commercial impact and discussions were ongoing. BXM also noted that under previous arrangements the size of liabilities could vary from original estimates over the construction period as National Grid responded to changing system backgrounds.
- 398 MT noted concern that the issues had only been discussed with a minority of parties and much more work was required.
- 399 JN noted industry frustration due to the perceived lack of information and the application of processes that the industry had not had the opportunity to discuss.
- 400 BG noted the helpful discussion on this issue noting that although this was not a Grid Code issue comments would be fed back to National Grid Customer Agreements.

AOB 4Plant Resilience

- 401 RM noted that a report to the GCRP had not been available in time for this meeting. Following working group discussion National Grid had agreed to modify the Plant Resilience survey and re-circulate to those parties who had not responded to the first survey. Therefore those who had completed the first survey questionnaire were not required to re submit. A full report on the outcome would be available for the May GCRP meeting.

AOB 5

- 402 DN noted that since the launch of the new National Grid website the quality of the service with respect to obtaining documents and downloading had deteriorated.
- 403 BG noted that there was still some work ongoing to set up archive pages. In the meantime if Panel members required specific relevant documents these could be provided on request.

AOB 6

- 404 BG note that RM was changing her role within National Grid and would eventually be replaced as a National Grid representative on the GCRP. BG and Panel members thanked RM for her contribution to the GCRP.
- 405 BG also noted that DP was changing roles and this would be his last meeting as GCRP Secretary. BG and Panel members thanked DP for his contribution to the GCRP.

AOB 7

- 406 BG thanked MT for arranging the meeting venue at AEP offices.

**14. DATE, TIME & VENUE OF NEXT MEETING**

- 407 Thursday **23<sup>rd</sup> February 2006**, starting at **10:30 am**, and will be held at NGT offices at Lakeside House, Northampton:

Address: Lakeside House, The Lakes  
Bedford Road  
Northampton  
NN4 7SN

Tel: 01604 815000