STC Committee Response to Issues Raised by the Joint Planning Committee

The Joint Planning Committee (JPC) met on 31st May 2006, and provided a report of relevant issues discussed to the STC Committee. In that report, the JPC specifically requested the views of the STC Committee with regards to one item ("Item 7"). Additionally, another issue ("Item 5") was highlighted by the JPC as potentially requiring amendment to an STCP, but it was noted that the JPC was not leading on this matter.

The STC Committee discussed these two issues at their June and August Committee meetings, and, at the August meeting, agreed to respond to the JPC in writing. This note therefore forms that response.

<u>ltem 7</u>

Item 7 on the report from the JPC was:

The JPC would like to request the views of the STC committee on the planning timescales currently being utilised. Schedule 3 currently limits the exchange of planning data to a 7 year planning window, however, offers for connection are currently being made until at least 2014. Whilst this was not a problem during the transition period, we would now seek clarification of how this will work in practise on an enduring basis. The impact of having a restricted 7 years window could include:

- Not being able to make Connection Offers beyond a 7 window. In reality, this would mean not making any new Offers in Scotland for the foreseeable future.
- The process of Optimisation in Scotland will severely be hampered if restricted to 7 years.
- Being restricted to 7 years could reduce the Licensees' ability to develop an economic and efficient transmission network.

The STC Committee agrees that this '7 year window' will prove insufficient, particularly when consideration is given to the volume of connection applications that exist beyond this timeframe.

The exchange of Construction Planning Assumptions is permitted under the current framework because the relevant data is published in the Seven Year Statement (SYS), but is not explicitly listed in Schedule 3 of the STC. Construction Planning Assumptions are therefore limited to seven years because of the timescales covered by the SYS.

There is therefore a tension between Section D of the STC, which requires National Grid to provide Construction Planning Assumptions, and the provisions of Schedule 3, which do not explicitly permit this. This suggests that any connection offers outside of the 7 year timescale could only be based on Construction Planning Assumptions from the current SYS last year network configuration.

The STC Committee therefore considers that, if National Grid were able to provide the necessary Construction Planning Assumptions and background for years beyond this period, then the STC should be amended to allow them to do so. Such an approach would also offer the benefit that the exchange of all Construction Planning Assumptions could be explicitly permitted under Schedule 3 (or in Schedules 5, 6 and 7), rather than via the somewhat ambiguous provisions that currently apply. The STC Committee believes that this will be particularly relevant when considering what needs to be undertaken under Optimisation, and agrees that, in the absence of such a change, the Licensees' ability to develop an economic and efficient network could be impaired.

<u>ltem 5</u>

Item 5 on the report from the JPC was:

There is currently discussion about the storage and management of long-term outage data, currently responsibility for these lies in at least 2 places. We are lead to believe that this may lead to an amendment of STCP 11-1, but the JPC is not leading on this.

The STC Committee notes that TOGA, the primary means for the storage and management of outage proposals, has only recently been put into operational service. At this time there is ongoing work to resolve a small number of teething problem, for instance between OPD and TOGA. To ensure that the existing robust processes are accommodated by this process, the STC Committee believes that it would be appropriate to maintain the status quo until the start of 2007. This will support the development of the Year 1 plan up to week 49 submission.

The specific matter that the STC Committee believes does require to be considered within the effective management of outage proposals focuses on the interaction between relevant outage information as provided on a Project Listing Document (PLD), and the transfer into an outage proposal. At present there is no clear mechanism that controls the transfer of the relevant information and the subsequent 'close down' of the PLD as a mechanism for storing this data. It is recognised that the PLD is the initial stage in this process and that the detail provided at this stage will be revised/refined. To provide a co-ordinated outage planning approach, up to the 7-year ahead timescale, visibility is required at an early stage in any project.

Addressing this matter will require the amendment of both STCP11-1, Outage Planning, and STCP16-1, Investment Planning, to define the timely and consistent transfer of such outage information being transferred from PLDs. The STC Committee considers that having confidence in the outage plans is a key element of the contractual relationship between the SO, TO and Developer.

In considering the above, it was highlighted by SHETL that Outage Planning data originates from two areas, namely: via Investment Planning related activities; and via Connections related activities. To date the processes have tended to run in isolation of each other with the coordination being undertaken within the Control Room. This function is now being performed using TOGA. SHETL therefore suggested that, to allow sufficient time for the TOGA system to 'bed in', the pre-TOGA arrangements need continue in parallel, ideally until at least 2007/08. SHETL further suggested that the two abovementioned processes need to be considered together in detail to ensure that both are being facilitated optimally.

In response, National Grid expressed a belief that any parallel running of TOGA and pre-TOGA arrangements would be unnecessary, and noted that this had not previously been planned. However, National Grid agreed that, in developing potential changes to STCP11-1 and STCP16-1, outage planning data from both Investment Planning and Connections related activities should be considered together. It is likely that further discussion and consideration of this subject would be beneficial.