

Proposed Amendment CA042 Offshore Transmission System Compliance & Testing

1. Section 2.1. The STC Committee at the time of issuance of the report did not comprise any OFTOs. Subsequently OFTOs have joined the Committee. The proposal does affect OFTOs greatly and so we consider that the preparation should involve the OFTOs. Our comments are subject to the further understanding and involvement of the OFTOs that was proposed at the January 2011 Committee meeting.
2. Section 3.0. There is apparently no recognition given of the process being undertaken by Ofgem, Wind farm Developers and OFTOs in the purchase of the OFTO assets in the Transitional regime. The OFTO assets have been designed by the Developers to comply with the Grid Code and hence STC Section K requirements of the STC. The purchase is based on the principal of no construction risk by the OFTO purchaser. Whilst the OFTO will perform a Due Diligence exercise to establish the fitness for purpose of the assets it is purchasing it will not be possible to determine the fitness for purpose of the Section K compliance for voltage/reactive control since in most cases reactive control in part is provided by the generation owned by the developer .
There needs to be recognition of the responsibilities on the Developer during this process and believe that the OFTO is very dependent upon the Developer for information and contribution to the Compliance requirement. The situation for the Transitional regime may apply for the Enduring regime.
3. Section 3.5. Please clarify the requirement for the technical information for the modelling of control systems. What specifically is the technical information and its relationship to the requirements? Who will provide it?
4. Section 3.6. We believe the Amendment Proposal should address the detail of the process that would be in place to facilitate the high level requirements set out in the proposed text to amend section K. This is a complicated process with numerous technical and commercial boundaries and responsibilities. We believe to ensure that the proposals are correct, agreeable to us and enforceable that an understanding of the process is a requirement of the establishment of this Proposed Amendment. A draft STCP 19-5 should be attached to the Proposal.
5. Section 6.0. There is no inclusion of the OFTO Assessment of the proposal. We would expect the OFTO view to be included. We are not yet in a position to give that view as we have not been involved in the process of developing and agreeing this proposal.