STCP Modification Proposal Form (System Operator – Transmission Owner Code)

PMXXX: STCP09-1

01

Initial STCP Modification
Proposal Form

Update of procedure on 'Safety Coordination between Parties' covering HV proximity safety management and testing

Purpose of Modification: This proposal seeks to provide additional guidance on the subject of Proximity HV safety management and HV Testing across control boundaries by updating STC Procedure STCP09-1 which was first produced at BETTA go-live and has since been updated on a number of occasions.

It provides additional information on Emergency processes and aligns the document more closely to Grid Code OC8 processes. Additional RISSP forms have been included within the appendices which allow greater flexibility to users who may wish to record testing activities via the RISSP process documentation.



The Proposer recommends that this modification should be:

Implemented



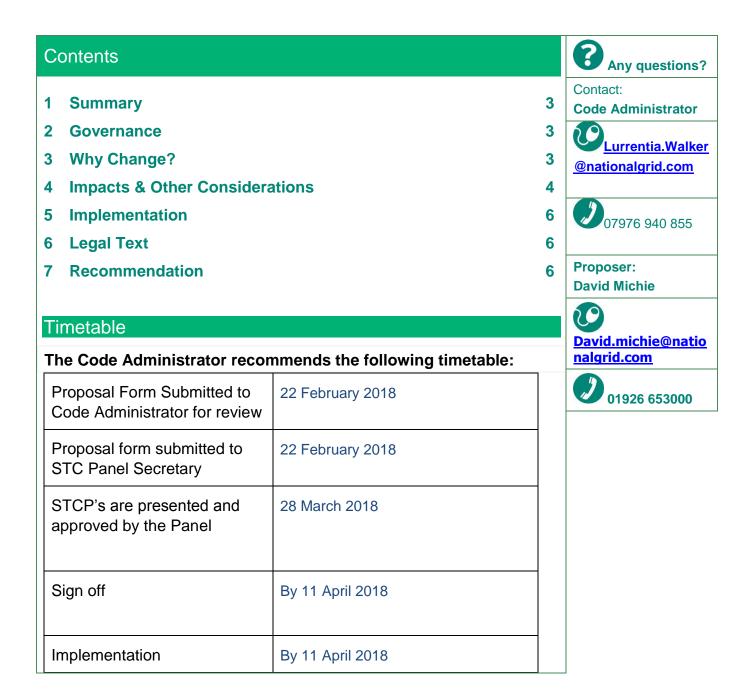
High Impact: No



Medium Impact: No



Low Impact: The information added to this STCP does not change the requirements but expands the guidance to include known practices ensuring users have adequate information to enact tasks in a safe and consistent manner.



Impact on Core Industry Documentation.

Please mark the relevant boxes with an "x" and provide any supporting information

BSC	
Grid Code	Х
CUSC	
Other	

The requirements for HV safety management and coordination stem in part from section OC8 of the Grid Code which deals with Safety Coordination. The changes proposed to STCP09-1 provide further guidance only and no changes to the Grid Code are required.

1 Summary

Following several requests to provide clarity on STCP09-1 subject matters, a review group was established consisting of the majority of affected stakeholders.

The review group considered the existing guidance incorporated in STCP09-1 and expanded on this to reflect current practices and to provide further clarity on subject matters as follows:

- Additional guidance on Proximity has been added to align with established Grid Code OC8 practices which are referenced within the original document.
- Additional information on Emergency processes has been added to the procedure which aligns to Grid Code standards at control boundaries.
- Additional 'Record of Inter-System Safety Precautions' (RISSP) forms have been included within the appendices which allows greater flexibility to users who may wish to record testing activities via the RISSP process documentation.

Overall, the additional guidance while not changing any of the established processes will make it easier for users to follow these as established under STCP09-1 in a safe and consistent manner.

2 Governance

Section B 7.3 states amendments for a STCP need approval from the STC Modification Panel. The Proposer recommends that this final proposal should now be approved and implemented at the March 2018 STC Panel meeting.

3 Why Change?

Following several requests to provide guidance on both HV Testing and Proximity an industry review group was established to help add further guidance to the procedure. Additional information was requested by the group to help clarify missing sections such as emergency processes and ways to help manage testing activities.

The modifications do not change known or established practices and will help to align processes across the industry and reduce potential breaches of STCP09-1 due to incomplete guidance, so improving safety.

4 Impacts & Other Considerations

The impact of this proposal will be to add clarity and guidance to the existing requirements upon TOs and potentially other Users of HV equipment.

Each of the TOs has been involved in the workgroup that developed this proposal.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

None identified.

Consumer Impacts

Consumers will not be directly impacted by this proposal.

STC Parties' Assessments

National Grid (SO)

The SO is supportive of these proposals which will result in positive development of the existing STCP09-1 procedure.

National Grid (TO)

Offshore Transmission Owners (OFTOs)

Scottish Hydro Electric Transmission plc (SHET)

SP Transmission Limited (SPT)

Representatives of each of the TOs participated in the workgroup that reviewed this STCP. All parties are fully supportive of the revisions which provide greater clarity and align with existing working practices.

Impact on STC/STCPs

There is no impact on the STC or other STCPs. It is likely that a consequential change to section OC8 of the Grid Code will though be required for alignment.

Relevant Objectives

Impact of the modification on the STC Applicable Objectives and STCP Assessment Criteria:	
Relevant STC Objective	Identified impact
(a) efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act	Positive
(b) development, maintenance and operation of an efficient,	Positive

economical and coordinated system of electricity transmission	
(c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity	None
(d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees	Positive
(e) promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.	Positive
(f) facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;	None
(g) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.	None

In addition for an STCP Change, Section B 7.3.2 details that the following should be considered:

Provision	View of the Proposer
the amendment or addition does not impair, frustrate or invalidate the provisions of the Code	Agree
the amendment or addition does not impose new obligations or liabilities or restrictions of a material nature on Relevant Parties which are not subsidiary to the rights and obligations of the Relevant Parties under the Code	Agree
the amendment or addition is not inconsistent or in conflict with the Code, Transmission Licence Conditions or other relevant statutory requirements	Agree
the Relevant Party Representatives deem that the amendment or addition is appropriate to support compliance with the Code	Agree

The Proposer believes that this change will better facilitate relevant objective(s) A, B, D & E and that Section B 7.3.2 is satisfied.

As stated above, the amendments to STCP09-1 do not change the requirements of this STCP but add guidance so reducing the potential for breaches, and improving safety and working practices.

5 Implementation

The amendment to STCP09-1 will be implemented following approval by the STC Panel.

6 Legal Text

Please refer to the legal text included as an appendix to this paper

7 Recommendation

Approve that the amendments to STCP09-1 are made as detailed.