CONSULTATION DOCUMENT

CUSC Amendment Proposal CAP104

Amendment to System to Generator Inter-trip related Terms concurrently defined in the Grid Code and CUSC

The purpose of this document is to consult on Amendment Proposal CAP104 with CUSC Parties and other interested Industry members

Amendment Ref	CAP104
Issue	1.0
Date of Issue	30th August
Prepared by	National Grid

I DOCUMENT CONTROL

a National Grid Document Control

Version	Date	Author	Change Reference
0.1		National Grid	Initial Draft for internal comment
1.0		National Grid	Formal version for release

b Document Location

National Grid website:

http://www.nationalgridinfo.co.uk/cusc/mn_consultation_index.html

c Distribution

Name	Organisation
CUSC Parties	Various
Panel Members	Various
Interested Parties	Various
Core Industry Document Owners	Various
National Grid Industry Information Website	-

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1.0 SUMMARY

1.1 CAP104 seeks to remove the definitions of system to generator Inter-trip categories and associated terms from the CUSC and replace them with a reference to the Grid Code where they are concurrently defined in an identical manner. NG believes this will prevent ambiguity between the two codes and rationalise the number of future amendments.

1.2 CAP104 was proposed by National Grid and submitted to the CUSC Amendments Panel for consideration at their meeting on 25th August 05. The Amendments Panel determined that CAP104 was ready to proceed to wider industry consultation by National Grid.

1.3 This document initiates this wider consultation exercise and invites views on CUSC Amendment Proposal CAP104. The consultation closing date is **30th September 2005.**

2.0 INTRODUCTION

2.1 This is a consultation document issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State.

2.2 Further to the submission of Amendment Proposal CAP104, this document seeks views from industry members relating to the Amendment Proposal.

2.3 This consultation document outlines the nature of the CUSC changes that are proposed. Representations received in response to this consultation document will be included in National Grid's Amendment Report that will be furnished to the Authority for their decision.

2.4 This consultation document has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at http://www.nationalgrid.com/uk/indinfo/cusc, and the Amendment Proposal form.

3.0 THE AMENDMENT PROPOSAL

3.1 CAP104 would facilitate National Grid's previously stated intentions with CAP076. CAP076 (Treatment of System to Generator Inter Tripping Scheme) and companion Grid Code change (A/05, Grid Code change consequential to the CUSC Amendment Proposal CAP076) was implemented in July 2005, and added four defined categories of system to generator inter-trips and associated technical terms into the CUSC. Due to the concurrent nature of these amendments, and the number of Working Group Alternative Amendments (WGAA) included within the working group report, it was deemed expedient to define these inter-trip terms in the change proposals of both codes.

3.2 National Grid indicated if CAP076 was implemented a further proposal would be submitted to remove the definitions within the CUSC and replace them with a reference to the identical definitions within the Grid Code. This view was supported by some industry parties at the time of CAP076 who believed

the Grid Code would be the most appropriate place for the definitions due to their technical nature.

3.3 In addition, Ofgem acknowledged in the decision letter for CAP076 that National Grid had offered to raise a modification removing the definitions from the CUSC to "minimise future change co-ordination issues ".

4.0 ASSESSMENT AGAINST THE APPLICABLE CUSC OBJECTIVES

4.1 The removal of definitions relating to the system to generator inter-tripping categories from the CUSC will better facilitate CUSC objective (a)(The efficient discharge by National Grid of the obligations imposed on it by the Act and the Transmission Licence), by rationalising the number of codes that may need to be altered in light of any amendments relating to, or associated with, these definitions

4.2 In addition removing any ambiguity associated with having the same terms defined in two different codes, will also better facilitate Applicable Objective (a).

5.0 IMPLEMENTATION AND TIMESCALES

5.1 National Grid proposes that CAP104, if approved, should be implemented 10 days after an Authority decision. In accordance with 8.19.3(b) views are invited on this proposed implementation date.

6.0 INITIAL VIEW OF AMENDMENTS PANEL

6.1 The Amendments Panel was comfortable for CAP104 to proceed to wider Consultation. The Amendments Panel discussed whether CAP104 should be taken forward as a "Housekeeping Amendment," under the provisions recently introduced into the CUSC via CAP085. However, the Amendments Panel agreed that this proposal went beyond the scope of the Housekeeping provisions, and hence that it was more appropriate to use the normal Amendment provisions in relation to this Amendment.

6.2 Several Panel Members also noted that the bringing forward of this Amendment was in line with their expectations from National Grid, following the introduction of CAP076.

7.0 INITIAL VIEW OF NATIONAL GRID

7.1 National Grid believes that is important to rationalise identical definitions to prevent ambiguity between codes within the industry. CAP104 removes the concurrent definitions within both the CUSC and the Grid Code inline with National Grid's intentions stated within CAP076 which was acknowledge by Ofgem in its Grid Code Amendment A/05 decision letter. National Grid believes this will be more efficient in terms of future modifications and prevent potential ambiguity between the two codes.

8.0 VIEWS INVITED

8.1 National Grid is seeking the views of interested parties in relation to the issues raised by Amendment Proposal CAP104 and issues arising from the proposed timescale for implementation of CAP104.

8.2 Please send your responses to this consultation to National Grid by no later than close of business on 30th September 2005.

8.3 Please address all comments to the following e-mail address:

Lindseyparadine@ngtuk.com

Or

CUSC.Team@uk.ngrid.com

Or alternatively, comments may be addressed to:

Lindsey Paradine
Amendments Panel Secretary
Commercial
National Grid plc
NGT House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Annex 1 - Proposed Text to Modify CUSC

Part A - Text to give effect to the Proposed Amendment

Conformed Version

Amend all definitions relating to generator inter-tripping scheme with section 11.3 of the CUSC, and replace with a reference to the identical definitions within the Grid Code.

Amend the following definitions within 11.3 as follows:

"Category 1 Intertripping Scheme"	~~a System to Generator Operational Intertripping Scheme arising from a Variation to Connection Design following a request from the relevant User which is consistent with the criteria specified in the Security and Quality of Supply Standard;~~ **as defined in the** Grid Code;
"Category 2 Intertripping Scheme"	~~a System to Generator Operational Intertripping Scheme which is:~~ ~~(i) required to alleviate an overload on a circuit which connects the Group containing the~~ User's Connection Site ~~to the~~ GB Transmission System; ~~and~~ ~~(ii) installed in accordance with the requirements of the planning criteria of the~~ Security and Quality of Supply Standard ~~in order that measures can be taken to permit maintenance access for each transmission circuit and for such measures to be economically justified,~~ ~~and the operation of which results in a reduction in~~ Active Power ~~on the overloaded circuits which connect the~~ User's Connection Site ~~to the rest of the~~ GB Transmission System ~~which is equal to the reduction in~~ Active Power ~~from the~~ Connection Site ~~(once any system losses or third party system effects are discounted);~~ **as defined in the** Grid Code;
"Category 3 Intertripping Scheme"	~~a System to Generator Operational Intertripping Scheme which, where agreed by~~ NGC ~~and the~~ User, ~~is installed to alleviate an overload on, and as an alternative to, the reinforcement of a third party system, such as the~~ Distribution System ~~of a Public Distribution System Operator;~~ **as defined in the** Grid Code;
"Category 4 Intertripping Scheme"	~~a System to Generator Operational Intertripping Scheme~~ installed to enable the disconnection of the ~~Connection Site~~ from the ~~GB Transmission System~~ in a controlled and efficient manner in order to facilitate the timely

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"Group"	~~restoration of the **GB Transmission System;**~~ as defined in the **Grid Code;** ~~**those** GB Transmission System **sub-stations bounded solely by the faulted circuit(s) and the overloaded circuit(s) excluding any third party connections between the Group and the rest of the** GB Transmission System**, the faulted circuit(s) being a** Secured Event;~~
"Secured Event"	**as defined in the** Grid Code; ~~has the meaning set our in the **Security and Quality of Supply Standard**;~~
"Security and Quality of Supply Standard"	**As defined in the Grid Code;** ~~**the version of the document entitled "Security and Quality of Supply Standard" established pursuant to the** Transmission Licence **in force at the time of entering into the relevant** Bilateral Agreement;~~
"System to Generator Operational Intertripping"	**as defined in the** Grid Code; ~~**a** Balancing Service **involving the initiation by a** System to Generator Operational Intertripping Scheme **of automatic tripping of the** User's Circuit Breaker(s) **resulting in the tripping of** BM Unit(s**) or (where relevant)** Generating Unit(s) **comprised in a** BM Unit **to prevent abnormal system conditions occurring, such as over voltage, overload, System instability, etc, after the tripping of other circuit breakers following power** System **fault(s);**~~
"System to Generator Operational Intertripping Scheme"	**as defined in the** Grid Code; ~~**a** System **to** Generating Unit **or** System **to** CCGT Module Intertripping Scheme **details of which shall be specified in Appendix F3 of the** relevant Bilateral Agreement, **being either a** Category 1 Intertripping Scheme, Category 2 Intertripping Scheme, Category 3 Intertripping Scheme **or** Category 4 Intertripping Scheme;~~ **as defined in the** Grid Code;

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CUSC Amendment Proposal Form	CAP:104

Title of Amendment Proposal:

Amendment to System to Generator Inter-trip related terms concurrently defined in the Grid Code and the CUSC.

Description of the Proposed Amendment ***(mandatory by proposer)*:**

This amendment proposal seeks to remove the definitions of system to generator Inter-trip categories from the CUSC and replace them with a reference to the Grid Code where they are concurrently defined in an identical manner.

Description of Issue or Defect that Proposed Amendment seeks to Address ***(mandatory by proposer)*:**

CUSC Amendment proposal CAP076 (Treatment of System to Generator Inter tripping Schemes), and companion Grid Code change proposal A/05, (Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Inter tripping Schemes) resulted in the definition of four categories of system to generator inter-trips and associated technical terms being introduced to the CUSC. Due to the concurrent nature of these amendments, and the number of Working Group Alternative Amendments (WGAA) included within the working group report, it was deemed expedient to define these inter-trip terms in the change proposals of both codes. This was coupled with an understanding that subsequent to the implementation of these modifications, if approved by the authority, National Grid would submit a proposal that removed the definitions in the CUSC and replace them with a reference to the definitions in the Grid Code. It was widely accepted by the industry that, without prejudice to their views on the benefit of CAP076, the Grid Code, rather than the CUSC, was the correct place to define these categories due to their technical nature.

This was acknowledged by OFGEM in its Grid Code Amendment A/05 decision letter

"OGEM notes the respondents' preference for the changes proposed in appendix A2 and considers there to be value in those technical definitions being included within the Grid Code given the level of relevant expertise within the Grid Code governance arrangements. OFGEM acknowledges NGC's offer to raise a CUSC amendment proposal to amend the definitions in the CUSC to minimise future change co-ordination issues should the Grid Code changes in Appendix 2 be approved"

CAP076 was implemented on 15/07/05, along with the associated Grid Code changes, and National Grid now seeks to rationalise the incidence of these definitions in line with our previous stated intentions.

Impact on the CUSC *(this should be given where possible)*:

Amendments relating to system to generator inter-tripping scheme in section 11 of the CUSC "Interpretations and Definitions" and replacement with reference to the identical definitions in the Grid Code. (Proposed code amendment text is attached at Appendix 1)

Impact on Core Industry Documentation *(this should be given where possible)*:

None

Impact on Computer Systems and Processes used by CUSC Parties *(this should be given where possible)*:

None

Details of any Related Modifications to Other Industry Codes *(where known)*:

A/05, Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Inter tripping Schemes

Justification for Proposed Amendment with Reference to Applicable CUSC Objectives** ***(mandatory by proposer)*****:**

By removing the amendments relating to the definitions of system to generator inter-tripping categories from the CUSC National Grid will better facilitate CUSC objective (a)(The efficient discharge by National Grid of the obligations imposed on it by the Act and the Transmission Licence), by rationalising the number of codes that may need to be altered in light of any amendments relating to, or associated with, these definitions and by removing any ambiguity associated with having the same terms defined in two different codes.

Details of Proposer: Organisation's Name:	National Grid
Capacity in which the Amendment is being proposed: (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Robert Smith National Grid 01926 654076 robert.smith@ngtuk.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	John Greasley National Grid 01926 656313 john.greasley@ngtuk.com
Attachments (Yes/No): Yes **If Yes, Title and No. of pages of each Attachment:** Appendix 1: CUSC section 11 changes in Line with CUSC Modification Proposal CAP104 (2 Pages)	

Notes:

1. *Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.*

2. *The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.*

The completed form should be returned to:

Lindsey Paradine
Panel Secretary
Commercial Frameworks
National Grid Company plc
National Grid Transco House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA
Or via e-mail to: CUSC.Team@uk.ngrid.com

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

Applicable CUSC Objectives** - These are defined within the National Grid Company Transmission Licence under Section C7F, paragraph 15. Reference should be made to this section when considering a proposed amendment.