



AMENDMENT REPORT

CUSC Proposed Amendment CAP104 Amendment to System to Generator Inter-trip related Terms concurrently defined in the Grid Code and CUSC

The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP104

Amendment Ref	CAP104
Issue	1.0
Date of Issue	14 th October 2005

I DOCUMENT CONTROL**a National Grid Document Control**

Version	Date	Author	Change Reference
0.1	03/10/05	National Grid	Draft for internal comment
0.2	04/10/05	National Grid	Draft for Industry comment
1.0	14/10/05	National Grid	Formal version for submission to the Authority

b Document Location

Nation Grid Website:

<http://www.nationalgrid.com/uk/indinfo/cusc>

c Distribution

Name	Organisation
The Gas and Electricity Markets Authority	Ofgem
CUSC Parties	Various
Panel Members	Various
National Grid Industry Information Website	

II CONTENTS TABLE

I DOCUMENT CONTROL..... 2

- a National Grid Document Control 2
- b Document Location 2
- c Distribution..... 2

1.0 SUMMARY AND RECOMMENDATION..... 4

2.0 PURPOSE AND SCOPE OF THE REPORT 4

3.0 THE PROPOSED AMENDMENT 5

4.0 IMPLEMENTATION AND TIMESCALES 5

5.0 IMPACT ON THE CUSC 5

6.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES 5

7.0 IMPACT ON CUSC PARTIES 6

8.0 IMPACT ON CORE INDUSTRY DOCUMENTS 6

9.0 VIEWS AND REPRESENTATIONS 6

10.0 SUMMARY OF PANEL MEMBERS VIEWS..... 7

11.0 NATIONAL GRID RECOMMENDATION..... 7

12.0 COMMENTS ON DRAFT AMENDMENT REPORT..... 7

ANNEX 1 - AMENDMENT PROPOSAL FORM 8

ANNEX 2 – PROPOSED TEXT TO MODIFY CUSC 10

- Part A - Text to give effect to the Proposed Amendment..... 10

ANNEX 3 – COPIES OF REPRESENTATIONS RECEIVED TO CONSULTATION 12

1.0 SUMMARY AND RECOMMENDATION

- 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. National Grid 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 Amendment Panel for consideration at their meeting on 25th August 2005. The Amendments Panel determined that CAP104 was ready to proceed to wider industry consultation by National Grid.
- 1.3 The Consultation Document for CAP104 was published by National Grid on 30th August 2005, placed on the CUSC website and copies sent to Core Industry Document Owners and CUSC Parties. Responses were invited by close of business on 30th September 2005.
- 1.4 National Grid received a total of 4 responses to the consultation for CAP104.

National Grid Recommendation

- 1.5 National Grid believes that it 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 in line with National Grid's intentions stated within CAP076 which was acknowledged 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.
- 1.6 It is recommended that CUSC be modified in line with CAP104, 10 business days after an Authority's decision.

2.0 PURPOSE AND SCOPE OF THE REPORT

- 2.1 This Amendment Report has been prepared and 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. It addresses issues relating to the removal from the CUSC of system to generator inter-trip categories definitions and other associated terms.
- 2.2 Further to the submission of Amendment Proposal CAP104 (see Annex 1) and the subsequent wider industry consultation that was undertaken by National Grid, this document is addressed and furnished to the Gas and Electricity Markets Authority ("the Authority") in order to assist them in their decision whether to implement Amendment Proposal CAP104.
- 2.3 This document outlines the nature of the CUSC changes that are proposed. It incorporates National Grid's recommendations to the Authority concerning the Amendment. Copies of all representations received in response to the consultation have been also been included and a 'summary' of the representations received is also provided. Copies of each of the responses to the consultation are included as Annex 3 to this document.
- 2.3 This Amendment Report 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>.

3.0 THE PROPOSED AMENDMENT

Background

- 3.1 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.

The Proposed Amendment

- 3.2 CAP104 would facilitate National Grid's previously stated intentions with CAP076. 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 IMPLEMENTATION AND TIMESCALES

- 4.1 It is recommended that CUSC be modified in line with CAP104, 10 business days after an Authority's decision and this has been the unanimous view of respondents to the Consultation.

5.0 IMPACT ON THE CUSC

- 5.1 CAP104 requires amendments to Section 11 (Interpretation and Definitions) of the CUSC.
- 5.2 The text required to give effect to the Proposed Amendment is contained as Annex 2 of this document.

6.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES

- 6.1 The removal of definitions relating to the system to generator inter-tripping categories from the CUSC will in the view of National Grid, 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 codes that may need to be altered in light of any of any amendments relating to, or associated with, these definitions.

- 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 IMPACT ON CUSC PARTIES

- 7.1 No impact has been identified on CUSC Parties from the Proposed Amendment.

8.0 IMPACT ON CORE INDUSTRY DOCUMENTS

- 8.1 CAP104 will not have an impact on Core Industry Document or other industry documents.

9.0 VIEWS AND REPRESENTATIONS

- 9.1 This section contains a summary of the views and representations made by consultees during the consultation period in respect of the Proposed Amendment.

Views of Panel Members

- 9.2 No responses to the CAP104 consultation document were received from Panel Members.

View of Core Industry Document Owners

- 9.3 No responses to the CAP104 consultation document were received from Core Industry Document Owners.

Responses to Consultation

- 9.4 The following table provides an overview of the representations received. Copies of the representations are attached in Annex 3.

Reference	Company	Supportive	Comments
CAP104-CR-01	Centrica	Yes	Supportive of CAP104
CAP104-CR-02	EDF Energy	Yes	Supportive of CAP104
CAP104-CR-03	RWE	Yes	Supportive of CAP104
CAP104-CR-04	Scottish & Southern Energy	Yes	Supportive of CAP104

- 9.5 National Grid received a total of four responses to the Consultation. All respondents were supportive of the Proposed Amendment on the grounds that the modification better facilitated the applicable CUSC objectives and that the Grid Code would be the most appropriate place for the definitions due to their technical nature.
- 9.6 There was agreement from respondents that the proposed implementation date (of 10 working days after an Authority decision) was appropriate for this Amendment Proposal.

- 9.7 It should be noted that a response from Centrica has now been included in the final version of the Report, which was not circulated with the draft Amendment Report. This is because Centrica made a typographical error in the e-mail address that they used, when submitting their response, which meant that National Grid did not receive it. However, having seen clear evidence that Centrica had attempted to make a response within the relevant timescales, we had no objections to including it at this stage, for the Authority to consider.

10.0 SUMMARY OF PANEL MEMBERS VIEWS

- 10.1 The Amendments Panel was comfortable for CAP104 to proceed to wider industry consultation. The Amendment 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 it was more appropriate to use the normal Amendment provisions in relation to this Amendment.
- 10.2 Several Panel Members also noted that the brining forward of this Amendment was in line with their expectations from National Grid, following the introduction of CAP076.

11.0 NATIONAL GRID RECOMMENDATION

- 11.1 National Grid believes that it 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 in line with National Grid's intentions stated within CAP076 which was acknowledged by Ofgem in its Grid Code Amendment A/05 decision letter. National Grid believes this will be more efficient in terms of future modifications, it prevents potential ambiguity between the two codes and better facilitates Applicable CUSC Objective (a).

12.0 COMMENTS ON DRAFT AMENDMENT REPORT

- 12.1 National Grid received 0 formal responses following the publication of the draft Amendment Report, although the issue relating to the Centrica response was raised and resolved.

Annex 1 - Amendment Proposal Form**CUSC Amendment Proposal Form****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

“OFGEM 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.

Annex 2 – 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;~~

Formatted

“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;~~

Formatted

“Category 3 Intertripping Scheme”

~~a System to Generator Operational Intertripping Scheme which, where agreed by NCG 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;~~

Formatted

“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 restoration of the GB Transmission System;~~

~~as defined in the Grid Code;~~

Formatted

“Group”

~~these 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;~~

Formatted

“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);~~

Formatted

“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;~~

Formatted

Formatted

Annex 3 – Copies of Representations Received to Consultation

This Annex includes copies of any representations received following circulation of the Consultation Document (circulated on 30th August 2005, requesting comments by close of business on 30th September 2005).

Representations were received from the following parties:

No.	Company	File Number
1	Centrica	CAP104-CR-01
2	EDF Energy	CAP104-CR-02
3	RWE	CAP104-CR-03
4	Scottish & Southern Energy	CAP104-CR-04

Reference	CAP104-CR-01
Company	Centrica



Lindsey Paradine
Commercial Frameworks
National Grid Company plc
National Grid Transco House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Centrica Energy
Millstream East,
Maidenhead Road,
Windsor,
Berkshire SL4 5GD
Tel. (01753) 431052
Fax (01753) 431150
www.centrica.com
Our Ref.
Your Ref.
12 October 2005

Dear Lindsey,

CUSC Amendment Proposals CAP104 – Amendment to System to Generator Inter-trip related Terms concurrently defined in the Grid Code and CUSC

Centrica welcomes the opportunity to comment on this Amendment Proposal. Centrica concurs with the views expressed by National Grid in the consultation Document that the Grid Code is the most appropriate location for the definitions. Centrica believe this Amendment Proposal will better facilitate the Applicable CUSC Objectives by removing the duplication from the CUSC and the Grid Code.

If you have any questions regarding this response please ring me 01753 431137.

Yours sincerely,

Mark Manley
Contract Manager

A centrica business
Centrica plc - The group includes British Gas Trading, British Gas Services and Accord Energy
Registered in England No 3039654. Registered Office: Millstream, Maidenhead Road, Windsor, Berkshire SL4 5GD

Reference	CAP104-CR-02
Company	EDF Energy

Our Ref
Your Ref CAP104

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



Date 20 September 2005

Dear Lindsey,

**EDF Energy Response to CUSC Amendment Proposal CAP104 –
“Amendment to System to Generator Inter-trip related Terms concurrently
defined in the Grid Code and CUSC”.**

EDF Energy are pleased to have the opportunity to comment on CUSC Amendment Proposal CAP104.

We support the view of National Grid that it is inefficient for both the Grid Code and the CUSC to hold concurrent definitions of Intertrip related terms. Moreover, as stated in our response to the CAP076 consultation, we believe that these definitions are of a technical nature and agree that they therefore belong in the Grid Code.

The removal of these definitions from the CUSC will avoid any future ambiguity and reduce the need for consequential CUSC Amendment Proposals were the Grid Code definitions to be amended in future. Therefore we agree with the Proposer's view the CAP104 will better facilitate objective a), the efficient discharge of NGC's licence obligations.

As there will be no consequential changes arising from this Amendment, we agree that the implementation date should be ten days after an Authority decision.

If you have any queries, please do not hesitate to contact me on 020 7752 2524.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Moore'.

Stephen Moore
Energy Market Strategy
EDF Energy

40 Grosvenor Place Victoria London SW1X 7EN

EDF Energy plc
Registered in England and Wales
Registered No. 2366852
Registered Office:
40 Grosvenor Place Victoria
London SW1X 7EN
www.edfenergy.com

Reference	CAP104-CR-03
Company	RWE

RWE npower



Ms L Paradine
Amendments Panel Secretary - Commercial
National Grid Electricity Transmission plc
National Grid Transco House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Name John Norbury
Phone 01793 892667
Fax 01793 893051
E-Mail john.norbury@RWE.com

26th September 2005

Dear Lindsey

CUSC Amendment Proposal CAP104: Amendment to System Generator Inter-trip related Terms currently defined in the Grid Code and CUSC

Thank you for the opportunity to respond to the above CUSC consultation proposal. The following response is provided on behalf of the following CUSC Parties within RWE: RWE Npower plc, Npower Cogen Limited, Npower Cogen Trading Limited, Npower Direct Limited, Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited.

In our response to Grid Code Consultation A/05 (Grid Code changes consequential to CUSC Amendment Proposal CAP076: Treatment of System to Generator Intertripping Schemes), RWE stated that it would favour the technical definitions relating to system to generator intertripping schemes being set out within the Grid Code. In our opinion the Grid Code Review Panel is the appropriate technical forum best qualified to consider the technical issues associated with such schemes. Accordingly, RWE is supportive of the CAP104 proposal to remove the definitions relating to these schemes from the CUSC.

Yours sincerely

John Norbury
Network Connections Manager

RWE npower

Trigones
Windmill Hill Business Park
Whitefriars Way
Swindon
Wiltshire SN1S 6PB
T: +44(0)1793 887 77 77
F: +44(0)1793 89 25 25
I: www.nrenpower.com

Registered office:
RWE Npower plc
Windmill Hill Business Park
Whitefriars Way
Swindon
Wiltshire SN1S 6PB

Registered in England
and Wales no. 3892782

Reference	CAP104-CR-04
Company	Scottish & Southern Energy

-----Original Message-----

From: Garth.Graham@scottish-southern.co.uk [mailto:Garth.Graham@scottish-southern.co.uk]

Sent: 30 September 2005 15:35

To: GoldIC, Industry Codes

Subject: Re: Consultation Document for CAP104

[Dear Sirs,](#)

[This response is sent on behalf of Scottish and Southern Energy, Keadby Generation Ltd., Medway Power Ltd. and SSE Energy Supply Ltd.](#)

[Further to your email of 30th August 2005 concerning CUSC Consultation Document CAP104 \("Amendment to System to Generator Inter-trip related Terms concurrently defined in the Grid Code and CUSC"\) we do believe that CAP 104 will better facilitate the meeting of the requirements of the CUSC and we therefore support this proposed change.](#)

[We believe that the proposed implementation date \(of 10 working days after an Authority Decision\) is appropriate.](#)

[Regards](#)

[Garth Graham](#)
[Scottish and Southern Energy](#)