

Mark Perry  
Electricity Network Investment  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick CV34

By e mail

[eni.sqss@uk.ngrid.com](mailto:eni.sqss@uk.ngrid.com)

12<sup>th</sup> April 2011

Dear Mark

### **GSR008 text consultation**

The Renewable Energy Association, having been fully engaged with the review of the SQSS for several years, submits its comments on the changes to the text of the SQSS that largely implement the changes discussed earlier this year. As you are aware our members work on all types of renewable power and heat projects and we have long held the view that the SQSS is the foundation upon which all other matters relating to transmission such as access arrangements and charging are built.

As requested we are generally commenting merely on the wording proposed and whether it implements the intent of the changes. We have already made our views known on the principles of the changes and where we still disagree with them may raise this again should Ofgem choose to consult on the changes.

We are separately eagerly anticipating the progress of the changes to accommodate intermittent generation efficiently.

We examine the changes proposed in turn.

### **Adjusted N-1-1 requirement**

The change ends up in paragraph 4.6.6 rather than 4.6.5. Our only comment relates to the wording “or several generating units sharing a common circuit breaker.” The intention is presumably to recognise that a generating unit fault could take a long time to repair and therefore like an underground cable or transformer fault it is reasonable to consider this over the peak plus another fault outage. In our view if a generating unit although sharing a common circuit breaker with others can be isolated and the other units restored, it should only be the isolated generator that is considered on prior outage at time of peak. This could probably be implemented by changing the wording of this phrase to something like “or several generating units sharing a common circuit breaker where if one of the units is faulty it cannot be isolated to restore the other generating units to service.”

### **Clarification regarding use of dynamic ratings**

We think that there should be some scope for using dynamic ratings in the planning timescale in circumstances where intertripping and similar schemes are agreed. This is of course a matter of principle rather than wording.

### **Assumed reactive power output of generators**

Although possibly not consulted upon originally we would expect that the same proviso should be applied to testing for voltage levels (pre and post fault) and voltage step changes. This could be incorporated into the wording with something like “or, for the purpose of assessment of system stability and voltage control issues, that which may reasonably be expected under the conditions described in paragraph 2.8.4.”

### **Double Circuit Line Faults in SPT Areas**

We have no comment on the proposed wording changes.

### **Presentational Changes to Demand Security Table**

We welcome the table format change as a step towards further aligning the standard with P2/6.

### **Contribution of Embedded Generation to Demand Security**

Whilst we have reservations on the way that embedded generation is allowed for in P2/6 and therefore support a review, the proposed revised wording in 3.1.4 et seq. of the SQSS does bring the wording more into line with what is in P2/6.

### **Clarification of Applicability of Generation Connection Criteria**

Section 7.3 of the WG2 report suggests that the application of chapter 2 should extend from the grid entry points to the MITS. The drafting attached to this essentially applies section 2 from the Grid Entry point "into the MITS" which is not the same. We are aware that the current wording includes "into the MITS" which we regard as too vaguely defined. Further the WG2 recommendation was for paragraph 1.10 to apply the chapter 2 criteria from the Grid Entry Point "to the MITS".

### **Clarification of the Overlap of Generation and Demand Criteria**

We are happy with the wording of clause 1.23.2. For the avoidance of doubt though and covered by this clause although not well described in the description of the issue, the presence of generation may well reduce the amount of equipment that has to be provided but according to how generation is allowed to provide security in chapter 3 rather than because of applying generator rather than demand criteria to the demand.

### **Requirement to Assess Circuit Breaker Faults for their Potential to**

#### **Cause Unacceptable Voltage Rise**

The text wording appears to cover the intention of the working group.

#### **Consideration of generator trips**

In 2.10.5 there is reference to the prior outage of several generator units sharing a common circuit breaker. Should this not be the prior outage of several generator units sharing a common circuit breaker when if it is not possible to isolate the defective generator and restore the other ones to service?

The above also applies to clauses 3.9.2 and 8.8.2.

### **Revised Voltage Standards**

No obvious mistakes have been spotted in chapter 6 which implements the new limits in the on shore system.

We hope that you find these comments useful. Please let me know if you would like to discuss any of them further.

Yours sincerely

Gaynor Hartnell

Chief Executive, REA