

# Stage 05: Draft CUSC Modification Report

Connection and Use of System Code  
(CUSC)

## CMP204 Consequential to Grid Code Modification D/11 (System to Generator Operational Intertripping Schemes)

What stage is this  
document at?

01	Initial Written Assessment
02	Workgroup Consultation
03	Workgroup Report
04	Code Administrator Consultation
05	Draft CUSC Modification Report
06	Final CUSC Modification Report

This proposal seeks to modify the CUSC to make changes to section 4 to ensure that the System to generator Operational Intertripping Schemes which use the relevant Transmission Owners circuit breaker(s) is included.

This proposal is consequential to Grid Code Consultation D/11 'System to Generator Operational Intertripping Schemes'

Published on: 28 March 2012



**National Grid opinion:**

CMP204 should be implemented as it better facilitates the Applicable CUSC Objectives



**High Impact:**

None



**Medium Impact:**

None



**Low Impact:**

National Electricity Transmission System Operator (NETSO), Relevant Transmission Owners, Existing signatories to the CUSC.

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### Any Questions?

Contact:

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Code Administrator



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## About this document

This document is the draft of the CUSC Modification Report which contains the responses to the Code Administrator Consultation. This document has been prepared and issued by National Grid under the rules and procedures specified in the CUSC. The purpose of this document is to assist the Panel in their recommendation vote whether to implement CMP204.

Proposer:

**Jade Clarke**

National Grid Electricity  
Transmission Plc

## Document Control

Version	Date	Author	Change Reference
0.1	16/03/2012	National Grid	Draft for Industry comment
0.2	28/03/12	National Grid	Version for Panel Vote

## 1 Summary

- 1.1 CMP204 was proposed by National Grid Electricity Transmission Plc and submitted to the CUSC Modifications Panel for their consideration on 27<sup>th</sup> January 2012. The Panel determined that the proposal should be sent to the Code Administrator Consultation phase and report back to the CUSC Modifications Panel in April 2012 for the Panel Recommendation Vote.
- 1.2 Following Grid Code Consultation D/11 'System to Generator Operational Intertripping Schemes' in May 2011, it was recognised that there would be a subsequent requirement to undertake alterations to section 4 of the CUSC in order to ensure that the System to Generator Operational Intertripping Schemes which use the relevant Transmission Owners Circuit Breaker(s) is included. More detail is provided in Section 2 of this report.
- 1.3 This document outlines the Code Administrator Consultation and the nature of the CUSC changes that are proposed. Copies of all representations received in response to the Code Administrator Consultation are included as Annex 3 to this document.
- 1.4 This CUSC Modifications Report has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website at [www.nationalgrid.com/uk/Electricity/Codes](http://www.nationalgrid.com/uk/Electricity/Codes), along with the CUSC Modification Proposal form.

### CUSC Modifications Panel Recommendation

- 1.5 **To be completed post-Panel Recommendation Vote.**

### National Grid's Opinion

- 1.6 National Grid supports the implementation of CMP204 as it better facilitates the Applicable CUSC Objectives by improving the clarity of System to Generator Operational Intertripping Schemes within the CUSC.

## 2 Description of Proposed Modification

- 2.1 CMP204 is consequential to the Grid Code Consultation D/11 'System to Generator Operational Intertripping Schemes'. D/11 was raised as a result of an Ofgem recommendation within a decision letter for Grid Code Amendment F/08 'Grid Code requirements for System to Generator Operational Intertripping Schemes' which stated "We consider that NGET should undertake a further review of the system-to-generator operational intertripping scheme descriptions and requirements in the Grid Code in parallel with the implementation of the proposed offshore transmission regime".
- 2.2 The proposed changes to the Grid Code were discussed in Grid Code Consultation D/11 in May 2011. D/11 seeks to amend the Grid Code definition of System to Generator Operational Intertripping Schemes. This aims to clarify that such schemes can employ either the User's circuit breaker(s) or the relevant Transmissions Owner's circuit breaker(s) to ensure that the Grid Code is consistent with how System to Generator Operational Intertripping Schemes have been implemented for generators connected to relevant Transmission Licence Systems. There were 4 respondents to the Grid Code D/11 Consultation; all were supportive of the changes proposed.
- 2.3 The current CUSC drafting assumes that the System to Generator Operational Intertripping Schemes only employ the User's circuit breaker(s) whereas it has been found that this has not always been the case with recent examples both onshore and offshore. This may be confusing for User's as the CUSC states that the User's circuit breaker(s) will be used in such schemes whereas either the User's or the relevant Transmission Owner's circuit breaker(s) may be utilised.
- 2.4 This defect was also identified by EDF Energy in their response to Grid Code consultation D/11 in June 2011. They stated "You may care to consider raising a housekeeping change to CUSC to amend these clauses, in a similar manner to D/11 to encompass current trade practice by allowing for the possibility of use of the relevant Transmission Owner's circuit breaker, where this has been agreed as between the User and the relevant Transmission Owner".
- 2.5 The proposer's view is that the wording of 'System to Generator Operational Intertripping Schemes' under CUSC Section 4 – Balancing Services, can be changed in order to solve this defect. This change will make the 'System to Generator Operational Intertripping Schemes' definition within the CUSC consistent with the Grid Code definition. This proposal aims to clarify that either the relevant Transmission Owner's circuit breaker(s) or the User's circuit breaker(s) may be utilised within such schemes. This would have to be previously agreed with National Grid, the User and the Transmission Owner and outlined in their construction agreement.
- 2.6 This proposal aims to delete the mention of User when referring to circuit breakers being utilised in an Intertripping Scheme and add 'permit the arming of to clauses within the CUSC for User's to allow for relevant Transmission Owners circuit breakers to be armed in the event of an Intertrip Signal. Again this will be agreed with the User during the connection.
- 2.7 If D/11 is approved by the Authority, there will be an inconsistency between the codes. This proposal is consequential to and therefore related to Grid Code Amendment D/11. It is intended that CMP204 and Grid Code Amendment D/11 will progress to the Authority for a decision at the same time.

### Impact on the CUSC

- 3.1 CMP204 requires amendments to the following parts of the CUSC:
- Section 4 [Balancing Services]
- 3.2 The text required to give effect to this proposal is contained in Annex 2 of this document.

### Impact on Core Industry Documents

- 3.3 The proposer has not identified any impacts on Core Industry Documents.

### Impact on other Industry Documents

- 3.4 The proposer has not identified any impacts on other Industry Documents.

### Assessment against Applicable CUSC Objectives

- 3.5 The proposer considers that CMP204 would better facilitate the following CUSC Objectives
- (a) the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this licence;

This proposal better facilitates objective (a) as it provides clarification that a generator may be tripped by an intertrip signal to a transmission licensee owned circuit breaker. This will ensure that the System to Generator Operational Intertripping Schemes are operated in the most efficient manner.

- (b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

This proposal better facilitates objective (b) as it improves clarity of the 'System to Generator Operational Intertripping Schemes' and therefore better facilitates industry understanding of the CUSC which will better facilitate competition.

- (c) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

This proposal is neutral to objective (c)

## 4 Proposed Implementation

- 4.1 National Grid proposes CMP204 should be implemented 10 business days after an Authority decision. In accordance with 8.22.10 (b) of the CUSC.
- 4.2 All respondents to the Code Administrator Consultation supported this approach.

### National Grid Opinion

- 5.1 National Grid supports the implementation of CMP204 as it better facilitates the Applicable CUSC Objectives by improving the clarity of System to Generator Operational Intertripping Schemes within the CUSC.
- 5.2 National Grid acknowledges the response from RWE who state that if CMP204 is implemented, the Appendix F3 of relevant Bilateral Connection Agreements of customers will have to be amended. This will be done on a case by case basis where appropriate to ensure that it reflects the change proposed by CMP204.
- 5.3 The STC Panel noted on 28<sup>th</sup> February 2012 that there may be consequential changes to the STC as a result of CMP204, these possible changes need to be reviewed but will have no impact on the drafting of CMP204.

### CUSC Modifications Panel Recommendation

- 5.4 **To be completed after the Panel Recommendation Vote.**

## 6 Responses

6.1 The following table provides a summary of the responses received to the Code Administrator Consultation. The full responses can be found in Annex 3.

### Code Administrator Consultation Responses

6.2 The table below provides an overview of the representations received to the

No.	Respondent	Support	Better facilitates Applicable CUSC Objectives	Comments
1.	Scottish Power	Yes	Yes under (a) and (b)	<ul style="list-style-type: none"><li>Believes that CMP204 should approach at the same time as Grid Code amendment D/11</li></ul>
2.	SSE	Yes	Yes under (a) and (b)	<ul style="list-style-type: none"><li>No further comments</li></ul>
3.	RWE	Yes	Yes under (a) and (b)	<ul style="list-style-type: none"><li>In its Report to the Authority, it would be helpful for National Grid to confirm its intention to amend the text of Bilateral Connection Agreement F3 where required to ensure consistency with this change.</li></ul>



<b>CUSC Modification Proposal Form</b>	<b>CMP204</b>
<p><b>Title of the CUSC Modification Proposal:</b> <i>(mandatory by Proposer)</i></p> <p>Consequential to Grid Code Modification D/11 (System to Generator Operational Intertripping Schemes)</p>	
<p><b>Submission Date:</b> <i>(mandatory by Proposer)</i></p> <p>19<sup>th</sup> January 2012</p>	
<p><b>Description of the CUSC Modification Proposal:</b> <i>(mandatory by Proposer)</i></p> <p>This is a consequential Modification Proposal to the Grid Code Proposal D/11 ‘System to Generator Operational Intertripping Schemes’<sup>1</sup>.</p> <p>This Modification Proposal seeks to amend the CUSC to ensure that the System to Generator Intertripping schemes which use the relevant Transmission Owner’s circuit breakers are included. This modification is intended to clarify current business practice and to improve understanding of the ‘System to Generator Operational Intertripping’ section of the CUSC.</p>	
<p><b>Description of Issue or Defect that CUSC Modification Proposal seeks to Address:</b> <i>(mandatory by Proposer)</i></p> <p>D/11 was raised as a result of an Ofgem recommendation within a decision letter for Grid Code Consultation F/08 – ‘Grid Code Requirements for System to Generation Operational Intertripping Scheme’<sup>2</sup>, which stated “We consider that NGET should undertake a further review of the system-to-generator operational intertripping scheme descriptions and requirements in the Grid Code in parallel with the implementation of the proposed offshore transmission regime.”</p> <p>D/11 seeks to modify the Grid Code definition of a system to generator operational intertripping scheme. This aims to clarify that such schemes can employ either the User’s circuit breakers or the relevant Transmission Owner’s circuit breakers to ensure that the Grid Code is consistent with how System to Generator Operational Intertripping Schemes have been implemented for generators connected to relevant Transmission Licensees systems. Grid Code D/11 is currently waiting to be sent to the Authority until the progress of</p>	

<sup>1</sup> This is the link to Grid Code Consultation D/11 ‘System to Generator Operational Intertripping Schemes’

<http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/>

<sup>2</sup> This is the link to Grid Code Consultation F/08 ‘Grid Code Requirements for System to Generation Operational Intertripping Scheme’

<http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/2008/>

this CUSC Modification Proposal is determined.

The current CUSC drafting assumes that the System to Generator Operational Intertripping schemes only employ the 'User's' circuit breaker(s) whereas it has been found that this is not always the case, with recent examples both onshore and offshore. National Grid has previously used the relevant Transmission Owners circuit breaker which may be confusing for users because the CUSC states that the user's circuit breaker will be used. As this modification is consequential to the Grid Code modification D/11 which seeks to clarify the definition of Intertripping schemes, there will be an inconsistency between the codes if D/11 is approved.

This defect within the CUSC was also identified by a response from EDF Energy to Grid Code consultation D/11 which stated "You may care to consider raising a housekeeping change to the CUSC to amend these clauses, in a similar manner to D/11 to encompass current practice by allowing for the possibility of use of the relevant Transmission Owner's circuit breaker, where this has been agreed as between the user and the relevant Transmission Owner."

This response highlighted that the CUSC includes clauses on intertripping schemes referring to the User's circuit breaker only specifically in sections 4.2A.4 (c), 4.2A.2.2 (c) and (d), 4.2A.3, 4.2A.4 (b)(i) and (c), 4.2A.5 (d). These paragraphs are within the 'System to Generator Operational Intertripping' part of Section 4: Balancing Services of the CUSC, which we have reviewed and agree that these will require amending if D/11 is approved.

If implemented, this modification would amend clauses within Section 4 of the CUSC ('Balancing Services') in relation to 'System to Generator Operational Intertripping'. This would make it clear that the relevant Transmission Owner's (TO) circuit breaker(s) or the user's circuit breaker may be utilised in an Intertripping scheme when agreed with National Grid, the User and the TO during its connection. As this change is consequential to the Grid Code Proposal D/11, this will ensure that the Grid Code and CUSC will be kept consistent. It will also improve the clarity of the System to Generator Operational Intertripping schemes and therefore better facilitates industry understanding of the statements within the CUSC.

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

Changes are proposed to the following sections of the CUSC:

- Section 4: Balancing Services (specifically paragraphs 4.2A.2, 4.2A.3, 4.2A.4 and 4.2A.5)

**Do you believe the CUSC Modification Proposal will have a material impact on Greenhouse Gas Emissions? Yes/No:** *(assessed in accordance with Authority Guidance – see guidance notes for website link)*

No

**Impact on Core Industry Documentation.** Please tick the relevant boxes and provide any supporting information *(this should be given where possible)*

BSC

Grid Code

STC

Other

(please specify)

None

**Urgency Recommended: Yes / No** *(optional by Proposer)*

No

**Justification for Urgency Recommendation** *(mandatory by Proposer if recommending progression as an Urgent Modification Proposal)*

**Self-Governance Recommended: Yes / No** *(mandatory by Proposer)*

No

**Justification for Self-Governance Recommendation** *(Mandatory by Proposer if recommending progression as Self-governance Modification Proposal)*

**Should this CUSC Modification Proposal be considered exempt from any ongoing Significant Code Reviews?** *(Mandatory by Proposer in order to assist the Panel in deciding whether a Modification Proposal should undergo a SCR Suitability Assessment)*

The Modification should have no impact or crossover on the current SCR on Project Transmit.

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

None

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

Grid Code Amendment D/11.

Following the conclusion of a previous Grid Code Amendment, F/08, relating to the technical requirements that form part of a system to generator operational intertripping scheme, National Grid was asked by the Authority to review the intertripping scheme descriptions in the Grid Code. As a result Grid Code amendment D/11 was proposed to amend the definition of "System to Generator Intertripping" so that scheme which use the relevant Transmission Owner's circuit breakers are included, where all relevant parties have agreed this solution.

This CUSC Modification proposal is consequential to Grid Code Amendment D/11

## Justification for CUSC Modification Proposal with Reference to Applicable CUSC

**Objectives:** *(mandatory by proposer)*

Please tick the relevant boxes and provide justification:

(a) the efficient discharge by The Company of the obligations imposed upon it by the Act and the Transmission Licence

Assuming that Grid Code Modification D/11 will be implemented, this proposal better facilitates Objective (a) as it provides clarification that a generator may be tripped by an intertrip signal to a transmission licensee owned circuit breaker. This will ensure that the System to Generator Operational Intertripping schemes are operated in the most efficient manner

(b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

The proposal facilitates Objective (b) as it improves clarity of the 'System to Generator Operational Intertripping schemes' and therefore better facilitates industry understanding of the statements which will better facilitate competition.

(c) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.

This proposal is neutral under applicable CUSC Objective (c)

These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1

<b>Details of Proposer:</b> (Organisation Name)	National Grid Electricity Transmission PLC.
Capacity in which the CUSC Modification Proposal is being proposed: (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party
<b>Details of Proposer's Representative:</b> Name: Organisation: Telephone Number: Email Address:	<b>Jade Clarke</b> <b>National Grid Electricity Transmission PLC</b> <b>07825 202 356</b> <b>Jade.clarke@nationalgrid.com</b>
<b>Details of Representative's Alternate:</b> Name: Organisation: Telephone Number:	Alex Thomason National Grid Electricity Transmission PLC 01926 656379

Email Address:

[Alex.thomason@uk.ngrid.com](mailto:Alex.thomason@uk.ngrid.com)

## 4.2A SYSTEM TO GENERATOR OPERATIONAL INTERTRIPPING

### 4.2A.1 Application

The provisions of this Paragraph 4.2A shall apply to **The Company** and a **User** in respect of the provision by that **User** to **The Company** of **System to Generator Operational Intertripping** where details of a **System to Generator Operational Intertripping Scheme** are set out in Appendix F3 of the relevant **Bilateral Agreement**.

### 4.2A.2 Provision of System to Generator Operational Intertripping

4.2A.2.1 Each **User** hereby agrees, as between **The Company** and that **User**, to:-

- (a) (save where **Force Majeure** applies) make available its **System to Generator Operational Intertripping Scheme** for arming at all times when **Active Power** is being exported to the **National Electricity Transmission System** from the **Connection Site** at which such **System to Generator Operational Intertripping Scheme** is located;
- (b) arm, [or permit the arming of](#), the **System to Generator Operational Intertripping Scheme** in accordance with the terms of the relevant **Bilateral Agreement** when instructed by **The Company** (in accordance with **Grid Code** BC 2.8) by telephone (such instruction to be confirmed by facsimile substantially in the form set out in Schedule 3, Part I to this Section 4);
- (c) (where an instruction from **The Company** has been confirmed by facsimile in accordance with Paragraph 4.2A.2.1(b) above) following the tripping of the ~~User's~~ **Circuit Breaker(s)** upon receipt of a signal from the **System to Generator Operational Intertripping Scheme**:-
  - (i) restrict the export of **Active Power** from the **Connection Site** to the **National Electricity Transmission System** to the level of MW specified in such facsimile confirmation (or such increased level(s) as **The Company** may subsequently notify pursuant to Paragraph 4.2A.2.2(c)(i)) (“the **Restricted MW Export Level**”); and

- (ii) maintain such restricted export until such time as the **User** is notified by **The Company** in accordance with Paragraph 4.2A.2.2(c)(ii) that the **Restricted MW Export Level** no longer applies, whereupon the **User** shall be permitted to increase the export of **Active Power** from the **Connection Site** above the **Restricted MW Export Level**;
- (d) comply with any special instructions given by **The Company** in the performance of its obligations under Paragraph 4.2A.2.1(c); and
- (e) disarm the **System to Generator Operational Intertripping Scheme** when instructed by **The Company** (in accordance with **Grid Code BC2.8**) by telephone (such instruction to be confirmed by facsimile substantially in the form set out in Schedule 3, Part I to this Section 4).

4.2A.2.2 **The Company** hereby agrees to:-

- (a) notify the **User** as soon as reasonably practicable following **The Company** becoming aware of the requirement for arming of the **System to Generator Operational Intertripping Scheme**;
- (b) (where relevant) take any steps necessary to arm the **System to Generator Operational Intertripping Scheme** in accordance with the terms of the relevant **Bilateral Agreement**;
- (c) following the tripping of the ~~User's~~ **Circuit Breaker(s)** upon receipt of a signal from the **System to Generator Operational Intertripping Scheme**, notify the **User**:-
  - (i) as soon as the **Restricted MW Export Level**, whilst still applying, can be increased; and/or
  - (ii) as soon as the **Restricted MW Export Level** (as may be increased from time to time pursuant to (i) above) no longer applies

each such notification to be in accordance with **Grid Code BC 2.8** and to be made by telephone (such notification to be confirmed by facsimile substantially in the form set out in Schedule 3, Part II to this Section 4); and

- (d) issue an instruction to disarm, referred to in Paragraph 4.2A.2.1(e), as soon as reasonably practicable following **The Company** becoming aware that the requirement

for arming of the **System to Generator Operational Intertripping Scheme** has ceased (and such an instruction shall be deemed to have been issued for the purposes of this Paragraph 4.2A upon tripping of the ~~User's~~ **Circuit Breaker(s)** upon receipt of a signal from the **System to Generator Operational Intertripping Scheme**).

#### 4.2A.3 Intertrip Volume

Following the tripping of a ~~User's~~ **Circuit Breaker(s)** following receipt of a signal from a **System to Generator Operational Intertripping Scheme**, the resulting reduction in **Output** for each tripped **BM Unit i** or (where relevant) any tripped **Generating Unit(s)** comprised in a **BM Unit** shall be determined in accordance with the relevant formula set out in the **ABSVD Methodology Statement**, where such resulting reduction in **Output** is termed SE<sub>j</sub>.

#### 4.2A.4 Payments to the User

**The Company** shall make the following payments to the **User** in respect of **System to Generator Intertripping Schemes**:

- (a) a **Capability Payment** shall be paid in respect of each **Category 2 Intertripping Scheme** and each **Category 4 Intertripping Scheme** as follows:-
  - (i) **The Company** shall pay to the **User** an amount ("the **Capability Payment**") in consideration of the installation of the **System to Generator Operational Intertripping Scheme** and the **User's** obligations under Paragraphs 4.2A.2.1(a) and (b), being an amount per month determined by reference to the number of **Settlement Periods** during the month in question (and in respect of which the requirement for **System to Generator Operational Intertripping** is stated in Appendix F3 of the relevant **Bilateral Agreement**) and the payment rate (£/**Settlement Period**) specified in Schedule 4 to this Section 4; and
  - (ii) for the avoidance of doubt, where a **System to Generator Operational Intertripping Scheme** comprises both a **Category 2 Intertripping Scheme** and a **Category 4 Intertripping Scheme**, only one **Capability Payment** shall be payable by **The Company** to the **User** in respect thereof;



- (b) subject always to Paragraph 4.2A.5, a **Restricted Export Level Payment** shall be paid in respect of each **Category 2 Intertripping Scheme**, each **Category 3 Intertripping Scheme** and each **Category 4 Intertripping Scheme** as follows:-
- (i) the payment shall only be made where, following the tripping of the ~~User's~~ **Circuit Breaker(s)** upon receipt of a signal from the **System to Generator Operational Intertripping Scheme**, restrictions on the export of **Active Power** from the **Connection Site** apply in accordance with the terms of Paragraph 4.2A.2.1(c) above at any time after the period of 24 hours has elapsed following such tripping; and
- (ii) in such a case, **The Company** shall pay to the **User** upon request the **Restricted Export Level Payment**, by reference to the period from expiry of such 24 hour period until the time when **The Company** notifies the **User** in accordance with Paragraph 4.2A.2.2(c)(ii) that the **Restricted MW Export Level** no longer applies (“the **Restricted Export Level Period**”); and
- (c) subject always to Paragraph 4.2A.5, in respect of each **Category 2 Intertripping Scheme** and **Category 4 Intertripping Scheme**, where the ~~User's~~ **Circuit Breaker(s)** are tripped upon receipt of a signal from the **System to Generator Operational Intertripping Scheme**, **The Company** shall pay to the **User** an amount (“the **Intertrip Payment**”) being an amount (£/**Intertrip Contracted Unit**/trip) specified in Schedule 4 to this Section 4.

#### 4.2A.5 Withholding of payments

**The Company** shall not be obliged to make any **Restricted Export Level Payment** or **Intertrip Payment** pursuant to Paragraph 4.2A.4 where the tripping of **BM Unit(s)** or (where relevant) **Generating Unit(s)** comprised in a **BM Unit** occurs:-

- (a) during any period where the **System to Generator Operational Intertripping Scheme** is not instructed by **The Company** to be armed in accordance with Paragraphs 4.2A.2.2(a) and 4.2A.2.2(d); and/or
- (b) where the **User** has failed to arm, [or permit the arming of](#), the **System to Generator Operational Intertripping**

**Scheme** in accordance with the terms of Paragraph 4.2A.2.1(b); and/or

- (c) where the **User** has failed to exercise **Good Industry Practice** to restrict the export of **Active Power** from the **Connection Site** to the **Restricted MW Export Level** as required by Paragraph 4.2A.2.1(c) (ignoring any export above **Restricted MW Export Level** where pursuant to an instruction from **The Company** to provide any **Balancing Service(s)**); and/or
- (d) where no signal is received by the ~~User's~~ **Circuit Breaker(s)** from the **System to Generator Operational Intertripping Scheme**.

#### 4.2A.6 **Revisions to Appendix F3 of the Bilateral Agreement**

Where **The Company** requires **Routine Change(s)** (as defined below) to be made to Appendix F3 of the **Bilateral Agreement**, then the **User** shall not unreasonably withhold or delay providing to **The Company** written consent to any such **Routine Changes** and hereby authorises **The Company**, following receipt of such written consent, to make amendments on its behalf to Appendix F3 of the **Bilateral Agreement** to reflect such **Routine Change(s)** and undertakes not to withdraw qualify or revoke such authority or instruction at any time. For the purposes of this Paragraph 4.2A.6, "**Routine Change(s)**" shall mean changes to the nomenclature of transmission circuits associated with a **System to Generator Operational Intertripping Scheme** specified in Appendix F3 of the relevant **Bilateral Agreement** which do not necessitate replacement, renovation, modification, alteration or construction to the **User's Plant** or **Apparatus**.

#### 4.2A.7 **No payments for Category 1 Intertripping Schemes**

For the avoidance of doubt, no payment shall be made by **The Company** hereunder in respect of a **Category 1 Intertripping Scheme**.

**CUSC Code Administrator Consultation Response Proforma**

**CMP204 - Consequential to Grid Code Modification D/11 (System to Generator Operational Intertripping Schemes)**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **24 February 2012** to [cusc.team@uk.ngrid.com](mailto:cusc.team@uk.ngrid.com)  
Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the CUSC Modifications Panel when it makes its recommendation to the Authority.

These responses will be included in the Final CUSC Modification Report which is submitted to the CUSC Modifications Panel.

<b>Respondent:</b>	Man Kwong Liu 01355 352731 <a href="mailto:Man.kwong.liu@uk.ibm.com">Man.kwong.liu@uk.ibm.com</a>
<b>Company Name:</b>	IBM UK Ltd for and on behalf of ScottishPower
<b>Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives? Please include your reasoning.</b>	ScottishPower agrees that the proposal better facilitates the applicable CUSC objectives (a) and (b). It will ensure CUSC is consistent with the Grid Code and by improving the clarity of the System to Generator Operational Intertripping Schemes, it will better facilitates industry understanding of the statements within the CUSC.

<b>Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.</b>	Yes, but should be at the same time as Grid Code Proposal D/11.
<b>Do you have any other comments?</b>	No.

## CUSC Code Administrator Consultation Response Proforma

### CMP204 - Consequential to Grid Code Modification D/11 (System to Generator Operational Intertripping Schemes)

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **24 February 2012** to [cusc.team@uk.ngrid.com](mailto:cusc.team@uk.ngrid.com)

Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the CUSC Modifications Panel when it makes its recommendation to the Authority.

These responses will be included in the Final CUSC Modification Report which is submitted to the CUSC Modifications Panel.

<b>Respondent:</b>	Garth Graham ( <a href="mailto:garth.graham@sse.com">garth.graham@sse.com</a> 01738 456000)
<b>Company Name:</b>	SSE
<b>Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives? Please include your reasoning.</b>	<p><i>For reference, the Applicable CUSC Objectives are:</i></p> <p><i>(a) the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this licence; and</i></p> <p><i>(b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.</i></p> <p><i>(c) compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.</i></p> <p>We concur with Proposer that CMP204 does better facilitate the applicable CUSC Objectives (a) and (b) (for the reasons shown in paragraph 6.1 of the consultation document) and is neutral with respect to (c).</p>
<b>Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.</b>	Yes. We support the proposed implementation approach as set out in section 5 of the consultation document.
<b>Do you have any other comments?</b>	We have no further comments.

## CUSC Code Administrator Consultation Response Proforma

### CMP204 - Consequential to Grid Code Modification D/11 (System to Generator Operational Intertripping Schemes)

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **24 February 2012** to [cusc.team@uk.ngrid.com](mailto:cusc.team@uk.ngrid.com)

Please note that any responses received after the deadline or sent to a different email address may not receive due consideration by the CUSC Modifications Panel when it makes its recommendation to the Authority.

These responses will be included in the Final CUSC Modification Report which is submitted to the CUSC Modifications Panel.

<b>Respondent:</b>	John Norbury Network Connections Manager RWE Supply & Trading GmbH Windmill Hill Business Park Whitehill Way Swindon SN5 6PB T +44 (0)1793 89 2667 M +44 (0)7795 354 382 <a href="mailto:john.norbury@rwe.com">mailto:john.norbury@rwe.com</a>
<b>Company Name:</b>	RWE group of companies, including RWE Npower plc, RWE Npower Renewables Limited and RWE Supply & Trading GmbH
<b>Do you believe that the proposed original or any of the alternatives better facilitate the Applicable CUSC Objectives? Please include your reasoning.</b>	RWE supported Grid Code consultation D/11 and supports the consequential CUSC consultation CMP204.  We believe that the clarification provided by this change better facilitates the applicable CUSC objectives. In particular, the clarification will ensure that an offshore generator continues to be recognised as the provider of a System to Generator Operational Intertripping Balancing Service, irrespective of the ownership of the circuit breakers to be tripped.
<b>Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.</b>	RWE supports the proposed text given in Annex 2. We support the proposed implementation period of 10 business days after an Authority decision.
<b>Do you have any other comments?</b>	In its Report to the Authority, it would be helpful for National Grid to confirm its intention to amend the text of Bilateral Connection Agreement F3 where required to ensure consistency with this change.