

The National Grid Company plc

**Minutes of the
Grid Code Review Panel
Brandon Hall Hotel, Brandon, Coventry
9th September 2003**

Members/Alternates

Mike Calviou	(MC))	(Chair)
David Payne	(DP))	(Secretary)
Patrick Hynes	(PH))	National Grid
Rachel Morfill	(RM))	
Mike Kay	(MK))	
Ian Gray	(IG))	Network Operators
Jeff Hunt	(JH))	

Bridget Morgan	(BM)		OFGEM
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John Norbury	(JN))	Generators with Large Power Stations with total Reg. Cap.> 5GW
John Morris	(JM))	
Claire Maxim	(CM))	

David Ward	(DW))	Generators with Large Power Stations with total Reg. Cap.< 5GW
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Malcolm Taylor	(MTa))	Generators without Large Power Stations
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Advisors/Observers

Robert Lane	(RL)	CMK
Ben Graff	(BG)	NGC
Mike Thorne	(MTh)	NGC
Richard Scarth	(RS)	NGC

C Zhang	(CZ)	EDF Energy
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1 APOLOGIES FOR ABSENCE

1521 Apologies were received from:

- Nasser Tleis (National Grid)
- Andy Balkwill (National Grid)
- Chris Rowell (BSC Panel)
- Francois Boulet and David Nicol (EISO)
- Brian Sequeira (Suppliers).
- No representative for Non Embedded Customers had been identified.

APPROVAL OF MINUTES OF PREVIOUS MEETING (030522drpm.doc)

1522 Minute 1476 – DW commented that the setting for the first stage Low Frequency Disconnection relays was also included in the BGSA which appeared on National Grid's website.

1523 The minutes were otherwise agreed as a true record of the previous meeting.

3 MATTERS ARISING FROM PREVIOUS MEETING (not covered below)

3.1 Summary of actions (GCRP 03/20)

1524 All actions were either complete or covered by other agenda items.

3.2 Operational Intertripping Schemes (Paper GCRP 03/21)

1525 JN presented the paper which had been prepared jointly by Innogy, PowerGen, British Energy and AEP. The paper had been prepared following extensive debate at GCRP meetings as a result of a proposed Grid Code change associated with BSC Modification P87. At the May GCRP meeting National Grid had requested generators to detail their view of the issues (Ref: Action 1442).

1526 The paper described three categories of intertrip, pointed out associated risks to generators and commented that intertrips were of commercial benefit to National Grid and raised concerns that National Grid took decisions to use intertrips without considering the cost to generators. The paper proposed that the Grid Code should be amended to clarify when generators were required to provide intertrip schemes by virtue of connection but in all other circumstances the generator would be free to choose to provide an intertrip scheme as a commercial service.

1527 DW pointed out that intertrips could be required on large industrial demands as well as generators. DW also stated that the Grid Code Connection Conditions currently describe the difference between Mandatory and Commercial services and it would be helpful if this could be applied to Intertrips.

1528 MC asked whether the issue of cost could be resolved through Bid/Offer prices as risk would only occur if costs could not be reflected in B/O prices. JN felt that it would be inefficient for intertrip costs to be reflected by B/O prices, since the submitted Bid Price to cater for an intertrip event would mean that the generating unit would be unlikely to participate in the normal operation of the Balancing Mechanism, JN also felt that Balancing Mechanism provisions were not adequate and unclear as to what duration a Bid/Offer Acceptance would apply for in the event of an intertrip occurring.. However, the main concern was that Generators were at risk while intertrips were armed and the cost of this risk was not recognised by the Balancing Mechanism.

1529 It was recognised that all categories described in the paper needed to be considered but category (iii) described in paragraph 7 seemed to be the key issue for debate. It was not clear what amendment would be required to the Grid Code and MC felt that a working group should be set up to consider the issues. It was recognised there may also need to be an associated CUSC amendment to consider.

1530 GCRP members agreed to this approach. Nominations for a working group were requested to be forwarded to PH. PH and JN agreed to consider the Terms of Reference for the working group.

1531 **Action.** *GCRP members to provide nominations for an intertrips working group.*

1532 **Action.** *PH and JN to consider Terms of Reference for the working group.*

3.3 Checking of Physical Notifications submitted under the Grid Code (GCRP 03/22)

- 1533 PH stated that National Grid had considered the issue of whether Physical Notification data submitted to NGC should be checked and rejected if erroneous. National Grid believed that there was a need for such checks but given the short Balancing Mechanism timescales National Grid wanted to avoid the situation where lengthy discussions took place over submitted data. It was felt that the figure checked against should not be Registered Capacity (RC) and Connection Entry Capacity (CEC) seemed the most appropriate figure although some issue had been identified. Any checking would be done via an automatic process using a data type agreed by the GCRP as acceptable.
- 1534 JN was comfortable with National Grid carrying out checks for mistakes and non-compliant data as long as the checks had a legal basis and no new requirements were imposed. However there was some concern as to the consequences of such tests and the resulting National Grid action. PH stated that the existing rules were designed to enable operations to continue.
- 1535 It was agreed that a CEC based approach seemed to be the most appropriate way forward although some further clarification was required, in particular with respect to defaulting actions in the event of erroneous data being provided by generators.
- 1536 National Grid agreed to take the following actions:
- 1537 **Action:** *Review current procedures with respect to data rejection and circulate a note to GCRP members.*
- 1538 **Action:** *Propose Grid Code changes based on a CEC approach at the November GCRP meeting.*
- 1539 JN asked whether there was any merit in including proposed changes in Consultation C/03 related to Data Validation, Consistency and Defaulting Rules. PH stated that as the changes were likely to be significant it was more appropriate to consult separately on the issues if they were required.

4 GRID CODE DEVELOPMENT ISSUES (GCRP 03/23)

4.1 Report On Progress Of Consultation Papers (GCRP 03/23 Table 1)

- 1540 Table 1 of paper GCRP 03/23 detailed the current position with consultations. The following additional points were noted.
- 1541 F/02 – Proposed changes to the Grid Code BC2 consequent on BSC Modification Proposal P87. P87 had been rejected by the Authority and so the associated Grid Code change could not be approved.
- 1542 A/03 – Grid Code changes arising from new Capacity Terms proposed in CAP043. The Report to the Authority was expected to be sent by 12 September 2003.
- 1543 B/03 – Grid Code changes arising from BSC Modification P80. P80 had been rejected by the Authority and the associated Grid Code change would no longer be required. There would be no Report to the Authority prepared.

1544 C/03 – Proposed Grid Code changes required as a result of changes to the Data Validation, Consistency and Defaulting Rules. The Report to the Authority was expected to be sent by 12 September 2003.

1545 H/03 – Proposed Housekeeping changes. This Consultation had been sent out on 27 August 2003 with comments required by 22 September 2003.

4.2 Other Issues (GCRP 03/23 Table 2)

1546 There was nothing further to report on Outstanding Issues.

5. PROGRESS ON CURRENT GRID CODE MODIFICATION PROPOSALS

6 OTHER GRID CODE RELATED ISSUES

6.1 Governance of Electrical Standards (03/24)

1547 BG went through the paper which had been prepared by the Joint WG and thanked all who had contributed to the work of the joint group. The GCRP accepted the recommendations contained within the Joint WG Report.

1548 BG explained that proposed changes to standards falling within the scope of the revised Governance arrangements would be brought to the GCRP for discussion. If the Panel and National Grid were able to reach a broad consensus that the change was appropriate, National Grid would have the executive power to make that change. If the Panel and National Grid did not reach a consensus, the proposed change would go out to a Working Group if appropriate and then wider consultation. Following on from this, if National Grid and the Panel were able to reach a broad consensus National Grid would have the executive power to make the change at this point. If there was still no such consensus at this point, the proposed decision would go to Ofgem and Ofgem would take the executive decision as to whether or not to make the change.

1549 BG went on to explain that a consensus had now been reached on the list of standards to be included within the governance arrangements and 18 NGTS's plus EDT/EDL documents had been selected from a list of around 140 as representing those that had an impact on Users. BG pointed out that in practice it was difficult to set out criteria for the inclusion of documents in the list, but it was recognised that relevant documents should have an impact on Users. BG said that he would give further thought to the question of how the list of standards in question might be amended over time, and ensure that more detail on this subject would be included in National Grid's "Implementation Paper." CZ suggested that in addition to the existing NGTS documents which mainly deal with design specification/requirements, high level technical documents covering operational aspects should also be included under the governance of standards e.g. the setting for the first stage Low Frequency Disconnection relays.

1550 GCRP members agreed that it was not clear whether a Working Group was needed to consider further the implementation of these proposals. In the first instance, it was agreed that BG would write an implementation discussion paper. This would set out National Grid's proposals as to how these arrangements could be implemented. This paper would be circulated to GCRP Members. If GCRP Members felt, having read this paper, that a Working Group would be helpful, such

a Group would be constituted. If it was felt, in the light of this paper that a Working Group was not needed, National Grid would proceed to write a formal GCRP Amendment paper.

- 1551 In relation to the way in which National Grid would treat NGTS's that fell within the scope of the new arrangements, prior to the commencement of the new arrangements it was explained that the existing change procedures would be used but GCRP members would be informed. It was agreed that the relevant documents would need to be widely available, and BG indicated that National Grid were already considering how best to ensure that such documents appeared in the appropriate place on the National Grid Website.
- 1552 **Action:** *BG to publish a National Grid "Implementation Discussion" paper, setting out how National Grid believed the Joint WG Report should be implemented. Depending on the response to this paper, BG either to convene a Working Group to discuss this issue further, or to proceed to prepare a Consultation paper on proposed Grid Code changes.*
- 1553 **Action:** *BG to table at the November GCRP an update, and advice as to how the formal Consultation is progressing.*
- 1554 **Action:** *BG to publish a paper explaining the changes NGC were taking forward to the NGTS's prior to the introduction of the new Governance of Electrical Standards changes.*

6.2 Grid Code provisions related to mothballed plant and plant capability to run on alternative fuels (GCRP 03/25)

- 1555 MTh described the background to the paper using slides (available on the Grid Code website http://www.nationalgridinfo.co.uk/grid_code/mn_gcrp_business.html). The paper proposed that a working group should be set up to consider Grid Code changes to enable National Grid to collect data on plant capability to run on alternative fuels and also data on mothballed plant availability. It was recognised that there were associated confidentiality issues with collection and publication of such data. It was pointed out that the proposed Grid Code changes would formalise collection of the data for future years but Ofgem had requested National Grid to collect this data for the Winter 2003/04. National Grid had already written to generators in respect of this information.
- 1556 MTa stated that National Grid's letter had raised concerns by individual generators who were nervous about providing commercially sensitive data and they would only be prepared to provide this data if reassurance could be provided about confidentiality from higher levels in National Grid. There was also concern associated with trading implications and National Grid having access to the data. It was felt that the Grid Code was not the appropriate route for obtaining such data. Mothballing was a commercial decision which would differ from company to company and it was not clear what advantage would be gained from the provision of mothballing data and whether the data would even be provided in a useful format. The concerns raised also applied to data on alternative fuel. MTa also pointed out that the letter had been phrased in an ambiguous way and National Grid should not be surprised if each company responded in a different way.
- 1557 MC stated that the National Grid letter had been a one off case and was not a Grid Code issue. However the interesting comments on ambiguity would be relayed

back to Alan Smart. It was pointed out that National Grid was carrying out this exercise as a result of wide concern about data being available. However based on returns so far it appeared that meaningful data can be provided. MC felt that the other concerns raised should be discussed by a working group. Any questions as to whether this data should be requested at all should to be raised with Ofgem/DTI.

- 1558 JN stated that in reality plant that had been mothballed would deteriorate over time and it would be difficult to determine at what point return to service was not viable. A definition of 'mothballed' would be critical to the process. DW stated that Simon Lord of Edison Mission had commented the timespan to bring plant back to service could be dependent on commercial benefits. SL felt that this information should be submitted via Licence conditions to Ofgem rather than through the Grid Code route.
- 1559 GCRP members agreed that a working group should be set up to consider all of the associated issues. The paper proposed that the working group should report to the GCRP in November with a view to initiating a formal consultation in February 2004. BM indicated that Ofgem would prefer that the timescales were accelerated if possible and target the presentation of a detailed report presented to the November GCRP followed shortly after by a formal consultation.
- 1560 Nominations for the working group were requested by 23 September. MTa indicated that he would wish to be included on the working group along with Simon Lord of Edison Mission.
- 1561 **Action:** *National Grid to set up appropriate working group. Nominations to be sent to MTh.*

6.3 The National Grid Training process for OC8 Changes on Proximity Working (GCRP 03/26)

- 1562 RS presented the paper which indicated National Grid's approach to training of safety personnel in new OC8 procedures. It was recognised that this training was subject to approval by the Authority of the proposed OC8 changes. The paper had been prepared following comments made by Users that it would be useful if National Grid could indicate how it intended to carry its own training. However it was stressed that it was the individual Users responsibility to organise the training of its own staff.
- 1563 JN felt that the paper did not provide sufficient detail on the training processes. RS stated the purpose of the paper was to provide a snapshot of training to be provided by National Grid on the day and it was recognised that the training required further development
- 1564 JM asked if the training would be explained in other fora. RS explained that National Grid would consider whether to present the information at Safety Representatives fora.
- 1565 GCRP members were asked to forward any other comments to RS.
- 1566 It was also recognised that there was an issue with ensuring information was passed on to the Scottish Grid Code Review Panel. Although there was a standing item on the SGCRP agenda to consider the effect of E&W Grid Code

changes it would be considered useful if the issue was included on the SGCRP agenda.

6.4 Annual Summary Report for ROCOF Tripping incidents (GCRP 03/27)

- 1567 RM went through the Annual Report which details Embedded generation losses due to RoCoF incidents for generation trips greater than 1000MW. The report indicated that there had been 4 reported incidents, only 2 with associated RoCoF trips. However these included the largest rate of change of frequency recorded so far at 0.095 Hz/s. It was noted that RoCoF relay settings were the responsibility of the customer but a typical setting was 0.1Hz/s.
- 1568 With Respect to paragraph 4.2 of the report JN asked what would be the trigger for reviewing the current 1320MW limited quoted in the SQSS. MC explained that such a review would require a review of the SQSS but expected that the trigger could be any incident that would lead to such a review including a substantial increase in RoCoF incidents.
- 1569 DW commented that he understood that a number of small generators have low frequency relays set to operate at or near 49.5Hz, so they would be tripped for a low frequency excursion, even if the rate of change of frequency was small. It was recognised that there would be problems if large numbers of plant had such settings. MC stated that this may need to be considered and could be picked up should the extension to the criteria detailed in 5.1 (v) of the report be agreed. It was agreed that National Grid would produce an amalgamation of the RoCoF reports from previous years.
- 1570 **Action:** *RM to prepare amalgamation summary of RoCoF reports.*
- 1571 With respect to the recommendation in 5.1(v) MK felt that DNOs would probably support the proposal but a formal decision would need to be taken by the DNO's.
- 1572 CZ asked whether similar problems would arise should a high frequency situation arise rather than a low frequency situation. National Grid agreed to consider whether this would be a problem.
- 1573 **Action:** *RM to consider effect and number of incidents of increasing frequency.*

6.5 Maximum Generation Services (GCRP 03/28)

- 1574 The paper presented by MTh outlined that a substantial volume of generating plant is capable of an output greater than its declared maximum capability. Under NETA generators are required to deliver on a firm basis and should not exceed TEC which precludes offering this additional capacity which by its nature is non-firm. Market participants had pointed out that the amount of extra output potentially available could provide an extra security margin. A new Balancing Service was proposed to be known as 'Maximum Generation Service'. It was pointed out that although this new service would not be the same as the previous Maxgen, the principle was similar but would be used in emergency situations only. The changes proposed were to the Glossary and Definitions and Balancing Code 2 and avoided the need for the service to be required on a firm basis. A Grid Code consultation was proposed on the changes which would support proposed changes to Licence Condition AA4 documents which was also the subject of a consultation. The Grid Code consultation would indicate a link to this parallel consultation.

- 1575 DW asked if such a service could be linked to large industrial demands and demand reduction. PH felt that demand reduction would be easier to manage than demand increases but felt that the proposals were more suited to generation issues.
- 1576 DW also asked under what circumstances the proposed new service would be called. MC explained that the service would be limited to emergency circumstances only and it was intended to detail the circumstances in the Balancing Principles Statement (BPS). Generators would be required to provide the service on a 'Reasonable Endeavours' basis only.
- 1577 JN expressed concern over the lack of clarity in the Grid Code on how emergency situations were managed and felt that the proposed service could result in emergency situations occurring more frequently. JN felt there was a danger that incorrect signals would be given to the market. MTh reiterated that it was envisaged that the service would only be used in genuine emergency situations.
- 1578 MTa asked what Ofgem's involvement had been to date. BM was unaware of discussions with National Grid or within Ofgem other than relating to the paper circulated to GCRP members.
- 1579 MTa expressed concern that this service would be yet another bilateral opaque segment of the market. MC stated that it was expected that clarity would be provided through the Procurement Guidelines.
- 1580 It was proposed that the consultation would commence shortly with the expectation of a sending a report to the Authority in mid October 2003. Panel members were comfortable with the proposed Grid Code consultation.
- 1581 DW commented that it was important for market participants that the proposed arrangements were transparent. NGC already publishes a report annually on the results of tenders for the reserve service, and a maximum generation service could be reported in a similar way. MC said that NGC would consider how NGC should report on the proposed service.

7 BSC/CUSC MODIFICATION PROPOSALS (GCRP 03/29)

- 1582 As reported under the Consultation Papers progress report, P80, P87 and CAP002 had been rejected by the Authority.
- 1583 There was nothing further to report on this item.

8 REPORT FROM SCOTTISH GCRP

- 1584 DW stated that following separate meetings at Ofgem a joint meeting between SGCRP members and windfarm developers had been held. The main issues arising were the need for Fault Ride Through and Frequency Response and provision of Mvar range through a commercial service. The SGCRP felt it would be beneficial if the National Grid debate and the SGCRP debate was co-ordinated.
- 1585 DW also reported that the CC.6.3.3 change proposals were to be put forward for discussion at the SGCRP.

9 BETTA

1586 BM reported that several consultations were now either in progress or completed. These were:

- GB CUSC
- GB BSC
- SOTO Code
- Transmission Licence

Consultations on the Grid Code under BETTA and Generation, Supply and Distribution Licences was expected shortly.

1587 A Grid Code expert group has been established to assist Ofgem/Dti with the drafting of the GB Grid Code. BM again extended an invitation for interested parties to be involved with this expert group. BM also advised of the work being carried out by STEG.

10 ANY OTHER BUSINESS**10.1 GCRP Meeting Dates (GCRP 03/30)**

1588 The paper proposed dates for GCRP meetings in 2004. MTa asked that Elexon be made aware of these dates.

1589 **Action:** *DP to ensure Elexon aware of GCRP meeting dates.*

Other Business

1590 MK stated that Issue 3 of the Distribution Code would shortly be available from the Ofgem website.

1591 MK stated that TSG was setting up a seminar on 16th October 2003 to discuss the Generic Provisions issue. National Grid had been invited to contribute to the seminar.

1592 MTa asked that Ofgem consider displaying all licences in one area on the Ofgem website. BM agreed to discuss with colleagues at Ofgem.

1593 **Action:** *BM to discuss possibility of displaying all licences on Ofgem website.*

11 DATE, TIME & VENUE OF NEXT MEETING

1594 Thursday **20th November 2003**, starting at **10:30 am**, at NGT House, Warwick.