



A REPORT TO THE AUTHORITY

Pursuant to Paragraph 2 of Condition C14 of the
Transmission Licence

Grid Code changes relating to BSC proposal P243

Extension of OC2 obligations to include Interconnector Owners

**The purpose of this document is to assist the Authority in its
decision of whether to implement the proposed
Grid Code Modification**

Consultation Paper Ref	F/09
Issue	1.0
Date of Issue	11 December 2009
Prepared by	National Grid

DOCUMENT LOCATION

National Grid website:

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

DISTRIBUTION

Name	Organisation
Authority	Ofgem
Grid Code Review Panel Members	Various
National Grid Industry Information Website	

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A INTRODUCTION

1. Paragraph 2 of Condition C14 of the Transmission Licence granted to the National Grid Electricity Transmission plc ("National Grid") provides that National Grid shall, in consultation with Authorised Electricity Operators liable to be materially affected thereby, periodically review the Grid Code and its implementation. That paragraph also requires National Grid, following such review, to send to the Authority:-
 - (a) a report on the outcome of such review;
 - (b) any proposed revisions to the Grid Code as National Grid (having regard to the outcome of such review) reasonably thinks fit for the achievement of the objectives set out in sub-paragraph (b) of Condition C14 of the Transmission Licence; and
 - (c) any written representations or objections from Authorised Electricity Operators (including any proposals by such operators for revisions to the Grid Code not accepted by National Grid in the course of the review) arising during the consultation process and subsequently maintained.
2. This review examines proposed changes to the existing Grid Code provisions which may be needed in parallel with BSC proposal P243 'publication of generator forward availability by fuel type'.
3. The vast majority of the forward availability data required by P243 is already provided by the generators as Output Usable under OC2. However, P243 also requires publication of forward availability data for individual interconnectors. Consequently, a Grid Code change needs to be progressed in order to extend OC2 obligations to Interconnector Owners so that:
 - i) The existing Interconnector Owners provide OC2 data in the same way as the generators do.
 - ii) Any future Interconnector Owners have the same obligations as the existing Interconnector Owners.
4. Following P243 Working Group discussions on 23 September 2009, National Grid considers that the associated Grid Code changes need to be progressed relatively quickly with the aim that the Authority receives the Grid Code and the BSC reports around the same time for its consideration (the BSC report is scheduled to go to the Authority in December 2009).
5. National Grid, in accordance with its obligations under its Transmission Licence, consulted Authorised Electricity Operators by including Consultation Paper F/09 on the National Grid industry information website. This paper contained an explanation of the proposed amendments to the Grid Code and a copy is attached to this Report as Appendix 2. National Grid informed interested parties that a copy of the Consultation Paper had been placed on its website to ensure its wide availability. As the proposed changes impacted interconnector owners most significantly, we also contacted and outlined the changes to each of the three current interconnector parties.
6. Comments were invited from all such Authorised Electricity Operators by 4th December 2009. National Grid received 4 responses from Authorised Electricity Operators.
7. The proposed revisions to the Grid Code are explained below.

B DESCRIPTION OF THE PROPOSED AMENDMENTS AND THEIR EFFECTS

Background

1. National Grid provides a range of data to the Balancing Mechanism Reporting Service (BMRS) including a breakdown of near real-time (5-minute average) and half-hourly (30-minute average) generation by fuel type. This information is based on National Grid's operational metering and is available on http://www.bmreports.com/bsp/bsp_home.htm for the following categories:
 - (a) CCGT Modules;
 - (b) Oil Plant;
 - (c) Coal Plant;
 - (d) Nuclear Plant;
 - (e) Power Park Modules;
 - (f) Pumped Storage Plant;
 - (g) Non Pumped Storage Hydro Plant;
 - (h) Open Cycle Gas Turbine Plant;
 - (i) External Interconnection flows from France to England;
 - (j) External Interconnection flows from Northern Ireland to Scotland; and
 - (k) A single category containing any other generation not covered by (a)-(j) above.
2. The BSC proposal P243¹ (in progress) proposes to publish forward availability data for the above categories. With the exception of Interconnectors, this data is already provided by Generators as Output Usable under Grid Code OC2.
3. In parallel with P243, a Grid Code change needs to be progressed in order to extend OC2 obligations to Interconnector Owners so that:
 - i) The existing Interconnector Owners provide OC2 data in the same way as the Generators do;
 - ii) Any futures Interconnector Owners have the same obligations as the existing Interconnector Owners.
4. Given that the P243 is already in progress and the final P243 report is scheduled to go to the Authority in December 2009, the Grid Code consultation needs to be progressed in a timely manner.

National Grid uses information provided by Generators under OC2 relating to outages and Output Usable to plan the operation of the National Electricity Transmission System. With the increasing number of Interconnectors and other changes to the System, the impact of interconnector flows on the operation of the National Electricity Transmission System will become more critical. Consequently it would be beneficial to the operational planning process if information on interconnector outages and capacity were made available to National Grid through the OC2 process (rather than through less transparent operational agreements under which National Grid currently receives such information). Furthermore, it would add transparency to the requirements for new potential interconnector owners and align the way all present and future interconnector owners interface with National Grid.

Proposed Grid Code Changes

5. Generators provide National Grid with outage programmes and forecasts of the maximum level at which Gensets can export to the System (Output Usable) for the period 5 years down to 2 days ahead, National Grid provides each Generator with information on National

¹ Publication of Generator Forward Availability by Fuel Type. See <http://www.elexon.co.uk/changeimplementation/ModificationProcess/modificationdocumentation/modProposalView.aspx?propID=268>

Electricity Transmission System outages which are likely to affect the export capability of the Gensets. This information is used to:

- Facilitate the efficient and economic co-ordination of Gensets and National Electricity Transmission System outages;
 - Enable National Grid to provide surpluses of generation over demand for the National Electricity Transmission System and System Zones;
 - Plan the operation of the National Electricity Transmission System;
 - Provide market information to facilitate improved market participant decision-making.
6. In light of the BSC proposal P243, National Grid has considered two options for changes to the Grid Code:
- i) Make minimal changes to the Grid Code, as required by P243 i.e. only incorporate changes related to Output Usable; or
 - ii) Make changes that ensure consistency between obligations on Generators and Interconnector Owners i.e. incorporate changes related to both the Output Usable and the outage programmes;
7. If option 1 above is implemented, it is likely that OC2 will need to be reviewed in the future in order to ensure consistency between Generator obligations and Interconnector Owner obligations. This inconsistency and the inefficiency associated with going through the Grid Code governance again could be avoided if option 2 is pursued. Consequently, National Grid proposes that option 2 should be progressed in preference to option 1. Option 2 also has the benefit of more consistently aligning the interaction between National Grid and present and future interconnector owners.
8. This proposal will therefore widen the scope of OC2 to include Interconnector Owners (as defined in the CUSC) in respect of exchanging information with National Grid on the availability of interconnector capacity and outage programmes. Two definitions of interconnector capacity (based on the existing definition of Output Usable) are needed to take into account the bidirectionality of Interconnectors:
- **Interconnector Export Capacity** The daily or weekly forecast value in MW at the time of the daily or weekly peak demand of the maximum level at which the External Interconnection can export to the Grid Entry Point
 - **Interconnector Import Capacity** The daily or weekly forecast value in MW at the time of the daily or weekly peak demand of the maximum level at which the External Interconnection can import from the Grid Entry Point
- In addition, the Interconnector Owners and National Grid will exchange information about their outage programmes.
9. The proposed amendments are shown in Appendix 1.
10. It should be noted that another Grid Code modification is currently being progressed. E/09 consists of some minor Grid Code changes made necessary by CAP169 which enhances the provision of reactive power from Large Power Stations, Power Park Modules and embedded generation. The E/09 Consultation closed on 7th October 2009 and contained a change to Appendix 1 of OC2. The proposals within this consultation (F/09) also change OC2 although the two modifications **do not** change the same parts of this section. The proposed changes in Appendix 1 of this document are against the current baseline and if, subsequently, after the submission of the E/09 Report of the Authority the changes are implemented, the final proposals for F/09 will be against that baseline.
11. It is proposed that the Interconnector Owners will use the same process for exchanging information as the generators currently do i.e. via National Grid's TOGA system.

Impact on National Electricity Transmission System

The proposed changes will not have any adverse impact on the National Electricity Transmission System. The proposed changes will facilitate the discharge of potential BSC obligations by National Grid.

There is likely to be an impact on National Grid's TOGA system for facilitating exchange of information with Interconnector Owners. The level of system impact is likely to depend on the timing of the Authority decisions for F/09 and the related BSC proposal P243. Should the Authority approve the two proposals at different times, National Grid envisages deployment of two separate dedicated teams for implementation of F/09 and P243, which would incur additional costs.

For P243, the BSC Panel recommends an implementation date of:

- 05 November 2010 if the Authority approves P243 on or before 28 January 2010; or
- 23 February 2011 if the Authority approves P243 on or before 30 March 2010.

Should the Authority approve both F/09 and P243, National Grid considers that the most efficient implementation of the two proposals could be achieved if a decision on F/07 was aligned with the above timeline.

Impact on Grid Code Users

The proposals will place additional obligations on Interconnector Owners to provide OC2 data, and will provide additional clarity to Users and ensure consistency in interpretation of the requirements.

National Grid has separately discussed the potential impact of OC2 changes with the following Interconnector Owners:

- National Grid Interconnector Limited;
- Moyle Interconnector Limited; and
- BritNed Development Limited.

All the Interconnector Owners are broadly supportive of the proposed changes.

Assessment Against Grid Code Objectives

The proposed changes will better facilitate Grid Code Objectives by improving the consistency and clarity of the OC2 requirements.

Impact on Industry Documents

Impact on Core Industry Documents

None.

Impact on other Industry Documents

None.

Environmental Impact Assessment

Grid Code Report to the Authority F/09 is anticipated to have a zero environmental impact.

C RESPONSES

1. National Grid has consulted Authorised Electricity Operators on this issue. Four responses were received.
 - E.ON UK
 - Moyle Interconnector Limited
 - RWE Supply and Trading
 - SAIC on behalf of ScottishPower's Energy Wholesale Business
2. One respondent was supportive of the proposal and the remaining three respondents were 'satisfied', did "not have any major issues" or had "no objection" to the proposed changes.
3. The industry responses, along with National Grid's replies, are included as Appendix 3.
4. SAIC is supportive of the proposed grid Code Code change and support its implementation even if the related BSC proposal is not approved.
5. E.ON provided a further response to National Grid's reply which is also included in Appendix 3. E.ON reiterated their views that the information confidentiality needs to be clearly articulated to the industry but considered that this may be done outside of the Grid Code.
6. Moyle's main concern is with the added workload for data submissions within year 0. National Grid considers that there needs to be consistency between obligations on Generators and Interconnector Owners, and that the existing as well as future interconnector owners submit data in the same way as the Generators currently do.
7. RWE suggested changes to the proposed legal text related to alignment of the Grid Code and the CUSC definitions of Interconnector Owner, and use of "Interconnector" and/or "External Interconnection". These changes are minor in nature and have been implemented in the revised proposed legal text which is shown in Appendix 4.
8. RWE also suggested incorporation of obligations on Interconnector Owners, other than those proposed in OC2. National Grid considers that wider obligations on Interconnector Owners could be considered outside of F/09 as this consultation focuses on delivering changes relating to the BSC proposal P243.

D LEGAL TEXT AND RECOMMENDATIONS

The proposed Grid Code changes, including post-consultation revisions, are shown in Appendix 4 with deletions shown struck through and insertions highlighted by underlined text. A brief description of the proposed changes is given in section B.

Recommendation

National Grid recommends to the Authority that the proposed changes in Appendix 4 be approved such that there is greater clarity and consistency of obligations for all industry parties. If the proposed changes are implemented, the Interconnectors Owners will be obliged to provide the forward availability data in the same way as the generators currently do.

As indicated above, having regard to the outcome of the review described in this Report, National Grid proposes the revisions to the Grid Code set out in Appendix 4, which revisions we reasonably think fit for the achievement of the objectives referred to in sub-paragraph (b) of paragraph 1 of Condition C14 of the Transmission Licence. In view of this, National Grid would be grateful if the Authority would approve the revisions pursuant to paragraph 3 of Condition C14 of the Transmission Licence.

Since the proposed changes in F/09 and the related BSC proposal P243 are likely to impact the same National Grid IT system (i.e. TOGA), it would be more efficient to implement the two proposals at the same time, should the Authority approve both proposals. In this situation, National Grid would be grateful if the Authority made a decision on F/09 and P243 at the same time.

Given the logistic exercise of organising replacement pages to reflect the changes required by your letter of approval, I would be grateful if you would contact me prior to issuing any letter specifying an effective date in order to ensure that the date is consistent with any other Code changes which may then be approved or be close to being approved and is also aligned with IT systems releases and the time required for us to efficiently develop, implement and test the necessary changes.

E APPENDIX 1: PROPOSED GRID CODE CHANGES

Please See Separate Volume: Appendix 1

F APPENDIX 2: CONSULTATION PAPER F/09



**GRID CODE
CONSULTATION DOCUMENT**

Grid Code changes relating to BSC proposal P243

Extension of OC2 obligations to include Interconnector Owners

The purpose of this document is to consult on the above Grid Code Modification Proposal with authorised electricity operators liable to be materially affected by the proposed changes and forms the basis of the subsequent Report to the Authority

Consultation Ref	F/09
Issue	1.0
Date of Issue	6 November 2009
Responses required by	4 December 2009
Prepared by	National Grid

DOCUMENT LOCATION

National Grid website:

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

DISTRIBUTION

Name	Organisation
AEO's	Various
GCRP Members/Alternates	Various
Interested Parties	Various
National Grid Website	

A. INTRODUCTION

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4. Following P243 Working Group discussions on 23 September 2009, National Grid considers that the associated Grid Code changes need to be progressed relatively quickly with the aim that the Authority receives the Grid Code and the BSC reports around the same time for its consideration (the BSC report is scheduled to go to the Authority in December 2009).
5. Comments upon the proposed changes within this consultation should be sent to National Grid by **4 December 2009** as detailed in section C. The comments will be reviewed and responded to.
6. Following this consultation, National Grid will prepare a Report to the Authority detailing National Grid's recommended changes to the Grid Code and all comments/responses received from Authorised Electricity Operators through this consultation. Once sent to the Authority this report will be made available on National Grid's website.
7. Where Authorised Electricity Operators' responses have been marked as confidential they will not be published within the version of the Report to the Authority placed on the National Grid website.
8. The revisions to the Grid Code proposed by National Grid and sent to the Authority require approval by that body and will, if approved, come into force on such date (or dates) of which you will be notified by National Grid, in accordance with the Authority's approval.

B. DESCRIPTION OF THE PROPOSED AMENDMENTS AND THEIR EFFECTS

Background

1. National Grid provides a range of data to the Balancing Mechanism Reporting Service (BMRS) including a breakdown of near real-time (5-minute average) and half-hourly (30-minute average) generation by fuel type. This information is based on National Grid's operational metering and is available on http://www.bmreports.com/bsp/bsp_home.htm for the following categories:
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National Grid uses information provided by Generators under OC2 relating to outages and Output Usable to plan the operation of the National Electricity Transmission System. With the increasing number of Interconnectors and other changes to the System, the impact of interconnector flows on the operation of the National Electricity Transmission System will become more critical. Consequently it would be beneficial to the operational planning process if information on interconnector outages and capacity were made available to National Grid through the OC2 process (rather than through less transparent operational agreements under which National Grid currently receives such information). Furthermore, it would add transparency to the requirements for new potential interconnector operators.

Proposed Grid Code Changes

5. Generators provide National Grid with outage programmes and forecasts of the maximum level at which Gensets can export to the System (Output Usable) for the period 5 years down to 2 days ahead, National Grid provides each Generator with information on National Electricity Transmission System outages which are likely to affect the export capability of the Gensets. This information is used to:

¹ Publication of Generator Forward Availability by Fuel Type. See <http://www.elexon.co.uk/changeimplementation/ModificationProcess/modificationdocumentation/modProposalView.aspx?propID=268>

- Facilitate the efficient and economic co-ordination of Gensets and National Electricity Transmission System outages;
 - Enable National Grid to provide surpluses of generation over demand for the National Electricity Transmission System and System Zones;
 - Plan the operation of the National Electricity Transmission System;
 - Provide market information to facilitate improved market participant decision-making.
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- i) Make minimal changes to the Grid Code, as required by P243 i.e. only incorporate changes related to Output Usable; or
 - ii) Make changes that ensure consistency between obligations on Generators and Interconnector Owners i.e. incorporate changes related to both the Output Usable and the outage programmes;
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- **Interconnector Export Capacity** The daily or weekly forecast value in MW at the time of the daily or weekly peak demand of the maximum level at which the External Interconnection can export to the Grid Entry Point
 - **Interconnector Import Capacity** The daily or weekly forecast value in MW at the time of the daily or weekly peak demand of the maximum level at which the External Interconnection can import from the Grid Entry Point
- In addition, the Interconnector Owners and National Grid will exchange information about their outage programmes.
9. The proposed amendments are shown in Appendix A.
10. It should be noted that another Grid Code modification is currently being progressed. E/09 consists of some minor Grid Code changes made necessary by CAP169 which enhances the provision of reactive power from Large Power Stations, Power Park Modules and embedded generation. The E/09 Consultation closed on 7th October 2009 and contained a change to Appendix 1 of OC2. The proposals within this consultation (F/09) also change OC2 although the two modifications **do not** change the same parts of this section. The proposed changes in Appendix A are against the current baseline and if, subsequently, after the submission of the E/09 Report of the Authority the changes are implemented, the final proposals for F/09 will be against that baseline.
11. It is proposed that the Interconnector Owners will use the same process for exchanging information as the generators currently do i.e. via National Grid's TOGA system.

Impact on National Electricity Transmission System

The proposed changes will not have any adverse impact on the National Electricity Transmission System. The proposed changes will facilitate the discharge of potential BSC obligations by National Grid.

There is likely to be an impact on National Grid's TOGA system for facilitating exchange of information with Interconnector Owners.

Impact on Grid Code Users

The proposals will place additional obligations on Interconnector Owners to provide OC2 data, and will provide additional clarity to Users and ensure consistency in interpretation of the requirements.

National Grid has separately discussed the potential impact of OC2 changes with the following Interconnector Owners:

- National Grid Interconnector Limited;
- Moyle Interconnector Limited; and
- BritNed Development Limited.

All the Interconnector Owners are broadly supportive of the proposed changes.

Assessment Against Grid Code Objectives

The proposed changes will better facilitate Grid Code Objectives by improving the consistency and clarity of the OC2 requirements.

Impact on Industry Documents

Impact on Core Industry Documents

None.

Impact on other Industry Documents

None.

C. RESPONSES

20. This section will contain a summary of responses received during the Consultation and will be completed as part of the Report to the Authority.

21. Views are invited upon the proposals outlined in this report, which should be received **by 4 December 2009**. Views on the following areas would be especially welcomed:

- Impact of the proposals on Grid Code users.
- Any improvements or changes to the proposals that in a respondent's view would better facilitate the objectives of the Grid Code.

34. Your formal responses may be:-

Posted to: Shafqat Ali
Electricity Codes
Regulatory Frameworks
National Grid Electricity Transmission plc
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Emailed to: shafqat.r.ali@uk.ngrid.com

G APPENDIX 3: CONSULTATION RESPONSES TO THE PROPOSED CHANGE

The following Appendix contains copies of all representations received from Authorised Electricity Operators through the consultation period.

Original Responses to F/09 Consultation

No.	Company	File Number
1	E.ON UK	F/09-CR-01
2	Moyle Interconnector Ltd	F/09-CR-02
3	RWE Supply and Trading	F/09-CR-03
4	SAIC	F/09-CR-04

National Grid Replies to Consultation Responses

No.	Company	File Number
1	E.ON UK	F/09-CRR-01
2	Moyle Interconnector Ltd	F/09-CRR-02
3	RWE Supply and Trading	F/09-CRR-03
4	SAIC	F/09-CRR-04

Reference	F/09-CR-01
Company	E.ON



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M +44 (0)7595 125089

claire.maxim@eon-uk.com

— Tuesday 1st December 2009

Dear Shafqat,

Response to Grid Code Consultation F/09

Thank you for the opportunity to respond to the above consultation. This response is on behalf of E.ON UK and E.ON Energy Trading.

Although we have no objection to the proposed changes, we note that there is nothing within OC2 indicating that the data submitted may be published elsewhere under the vires of a different industry Code. Equally, there is nothing in the Objectives or Scope of OC2 to indicate that one of its objectives is to require the submission of data which will then be published to inform a market. Given that a great deal of technical data is submitted under various parts and clauses of the Grid Code, we believe that consideration should be given to indicating whether such data will be regarded as confidential (for example, this tends to apply to data submitted via the Data Registration Code). We believe it should be clear to parties submitting data under the Grid Code whether that data is confidential or not.

If you have any queries, please do not hesitate to contact me on the above number.

Yours sincerely

Claire Maxim
Trading Arrangements

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—
Wednesday 9th December 2009

Dear Shafqat,

Re: Grid Code Consultation F/09 NGET Response

Thank you for your reply to our response to the above consultation, and for the opportunity to discuss this issue with you by telephone.

We note the provisions of your licence. We believe there is precedent for citing data which will be passed to other parties, for example data given by generators to NGET being shared with the Relevant Transmission Licensees as part of the connection process under the CUSC and STC.

Our concern is that the provisions of OC2 have developed over the years on the understanding that Output Useable data submitted will only be published in an aggregated, anonymised form. E.ON supports transparency, and this is why we suggest that this fundamental change to the use of the data gathered under the provisions of OC2 does need to be clearly articulated and expressed to the industry at large should the Authority chose to determine in favour of the P243 alternate. It may be that this is done by means other than text in the Grid Code.

If you have any queries, please do not hesitate to contact me on the above number.

Yours sincerely

Claire Maxim
Lead Contract Manager

E.ON UK plc
Registered in
England and Wales
No 2366970
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG

1 | 1

Reference	F/09-CR-02
Company	Moyle

Grid code changes relating to BSC proposal P243

Moyle Interconnector Limited response

04 December 2009

Moyle Interconnector Ltd ("Moyle") owns and operates the 500MW HVDC interconnector between Scotland and Northern Ireland. The Interconnector connects the All-Ireland Single Electricity Market (SEM) to the GB BETTA Market. The SEM operates a day-ahead market and the System Operator for Northern Ireland (SONI) undertakes centralised dispatch in its area.

SONI acts as Interconnector Administrator for the Moyle Interconnector and this role includes transfers of data including Available Transfer Capacity (ATC) to the SEM and Physical Notifications to BETTA. To this end Moyle would envisage that SONI will submit the "Output Usable" data required under this proposal to National Grid Electricity Transmission ("NGET") while Moyle will provide the required data relating to planned outages.

The issues that Moyle seeks clarification on are as follows:

- (1) The proposal sets out various timeframes for provision of Output Usable data and outage programmes, with data to be provided annually for years 1-5 and daily for year 0. Moyle feels that the frequency of provision of data relating to the Interconnector in year 0 is somewhat excessive and would result in an unnecessary administrative burden. Due to the nature of the Interconnector the Output Usable does not fluctuate apart from in the event of an outage - outages are infrequent with Moyle Interconnector's availability historically being over 99%. In light of this Moyle feels that it would be more appropriate to advise NGET of its forecast Output Useable and update on its outage programme on, for example, a monthly basis given that these will not change with any regularity. Moyle would then endeavour to advise NGET at its earliest opportunity should either its forecast Output Useable or outage programme change between monthly updates.
Alternatively, Moyle could provide NGET with default submissions whereby if no daily/weekly submission is received from Moyle it is assumed that the default submissions apply. In this case Moyle would only provide an update should there be a change in forecast Output Usable or the outage programme. This would eliminate the need for unnecessary data transfers and reduce the required workload.
- (2) The terms Interconnector Export Capacity and Interconnector Import Capacity used in the definition of Output Useable are not clearly defined. While Moyle's physical capability is 500MW in either direction it is limited by its connection agreements to a maximum of

80MW west-east transfer and 450MW east-west transfer. Its Northern Ireland connection agreements also limit its east-west transfer capacity to 410MW in summer. Furthermore, these limits could be breached in the event of system operator trades in an emergency situation. There may also be periods where some interconnector capacity is not sold so is unlikely to be in use unless utilised by the system operator – should unsold capacity be included in Output Usable?

While we would assume that the Output Useable data to be provided to NGET is likely to be the maximum import/export capacity available under Moyle's connection agreements with NGET we would appreciate clarification as to what exactly Output Useable means when applied to interconnector capacity.

- (3) The consultation document does not indicate the means by and format in which the required data should be provided. At present SONI provides ATC data (which appears to be equivalent to Output Useable) to the SEM and this is in the form of a standard file generated by the Moyle Interconnector Trading System. It would be of benefit to Moyle and ease compliance with this proposal if the required data could be provided in this type of format rather than in a specific format determined by NGET.

Conclusion

While we do not have any major issues with this proposal our concerns are chiefly that the requirement to provide Output Useable data on a daily basis and updates on outage programmes on a weekly basis are with Generators in mind. The proposal does not therefore factor in the high levels of availability of the Moyle Interconnector and may result in an unnecessary administrative burden being created which we are keen to minimise.

We are happy to respond to any queries arising from our response or to discuss our response further.

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Reference	F/09-CR-03
Company	RWE

RWE Supply & Trading



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4th December 2009

Dear Shafqat

Grid Code changes relating to BSC proposal P243 (F/09)

Thank you for the invitation to provide comments on the above Grid Code consultation dated 6th November 2009. The following response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Supply & Trading GmbH and RWE Innogy GmbH.

We have provided comments previously on the draft proposals when discussed by the Grid Code Review Panel and we are generally satisfied with the proposed Grid Code changes. However, we do have a few comments outstanding which relate to the "Interconnector Owner":

- (1) We note that the definition of "Interconnector Owner" in the CUSC is different from that proposed in the Grid Code and, to avoid confusion, we suggest that these different definitions be aligned.
- (2) The need for a different definition within the Grid Code appears to have arisen due to CUSC referring to an "Interconnector" whilst the Grid Code refers to an "External Interconnection". It would be helpful to clarify within the Grid Code definitions should this be a terminology difference only and that two terms refer to the same physical entity, i.e. are interchangeable. We note that some confusion appears to have arisen within the proposed text, with OC.2.1.3 referring to "*Interconnector outage coordination*", which we assume should be "*External Interconnection outage coordination*" given that "Interconnector" is undefined in the Grid Code.
- (3) Regarding the proposed new obligation placed on an Interconnector Owner, we note that the Grid Code currently places no other obligations on an Interconnector Owner; indeed the only references to "owners" would seem to be offshore transmission owners and DC Converter Station Owners. It would therefore be helpful to clarify why it is proposed that this one obligation be placed on the "Interconnector Owner" and whether it would be appropriate

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HR B 14327

consider other Grid Code obligations that might also be placed on the Interconnector Owner.

- (4) We note that the other Grid Code obligations relating to external systems are placed on the Externally Interconnected System Operator and these may potentially conflict with the proposed obligations placed on the Interconnector Owner. For example, proposed clause OC2.4.3 places obligations on the Interconnector Owner in respect of NRAPM whilst BC1.5.5 (c) places NRAPM obligations on the Externally Interconnected System Operator. It would therefore be helpful to clarify the relationship expected to exist between the Interconnector Owner and the Externally Interconnected System Operator.

I trust that you will find the above comments helpful. If you wish to discuss any matters further please do not hesitate to contact me.

Yours sincerely

By e-mail

John Norbury
Network Connections Manager

Reference	F/09-CR-04
Company	SAIC



Shafqat Ali
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Ref GC F/09
Date 16th November 2009

Tel No. 01355 845208
Email: ukelectricityspoc@saic.com

Dear Shafqat,

Consultation Document for F/09: Grid Code changes relating to BSC proposal P243

ScottishPower welcomes the opportunity to provide comment on the above consultation. This response is submitted on behalf of ScottishPower's Energy Wholesale Business, which includes ScottishPower Generation Ltd and ScottishPower Energy Management Ltd.

ScottishPower are supportive of the proposed changes to the Grid Code. These changes will enable the delivery of the BSC Modification, as well as providing this information to the wider industry community, and as such should be implemented. Even if the BSC Modification were to be rejected by either the Industry or the Authority.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours sincerely,

Gary Henderson



For and on behalf of: ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd and ScottishPower Energy Management Ltd.

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9th December 2009

Dear Claire

Grid Code Consultation F/09

Grid Code changes relating to BSC proposal P243 - *Extension of OC2 obligations to include Interconnector Owners*

Thank you for your comments on the above Grid Code consultation received on 1st December 2009. We note that you have no objections to the proposed changes but believe that it should be clear to the parties whether the data submitted is confidential or not.

With regard to data confidentiality, National Grid considers that, given its wider legal obligations, it is not necessary to explicitly state in the Grid Code (or in any other code for that matter) whether any data submitted will be confidential. Section 105 of the Utilities Act 2000 (subsection 3(c)) states that restrictions on disclosure of information do not apply if "it is made by a licence holder and is required to be made by a condition of his licence". As an example, condition C3 (paragraph 10a) of National Grid' Electricity Transmission Licence states that the licensee shall comply with the BSC. If the proposed data provisions in P243 become part of the BSC, National Grid will be obliged to comply with these provisions, as required by its licence and as stated in the Utilities Act 2000.

Thank you for taking time to respond to this consultation. Your comments will all be included in the associated Report to the Authority. It is National Grid's intention to submit the 'Report to the Authority' to OFGEM imminently.

Yours sincerely

Shafqat Ali
Senior Commercial Analyst, Electricity Codes

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Company	Moyle



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11th December 2009

Dear Paul,

Grid Code Consultation F/09

Grid Code changes relating to BSC proposal P243 - *Extension of OC2 obligations to include Interconnector Owners*

Thank you for your comments on the above Grid Code consultation received on 4th December 2009. We note that you do not have any major issues with the F/07 proposal but would like clarification on:

- Frequency of data submission for year 0;
- Clarification regarding the terms Interconnector Import/Export Capacity and what needs to be included in the Output Usable;
- Format for data submission.

These issues are addressed below:

1. Frequency of data submission for year 0

The Operating Code 2 (OC2) of the Grid Code sets out various timescales for submission of Output Usable and outage data. For example, paragraph OC2.4.1.2.3 (a) requires weekly submission of this data (one value per week) for 2-52 weeks ahead and paragraph OC2.4.1.2.4 (b) requires daily submission of the data (one value per day) for 2-14 day ahead. These obligations require data submissions at set times to reflect the latest information available at these times. Furthermore, any changes to these times specifically for Interconnectors would lead to inconsistency between obligations on Generators and Interconnector Owners.

We have developed a specific data submission system called "TOGA" that is used by generators and transmission asset owners for submission of OC2 data. We anticipate Interconnector Import/Export Capacity and outages to be handled by that same web-based system that enables data submitters to efficiently meet their obligations and allows us to perform our related activities.

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National Grid considers that the data submissions by Interconnector Owners should follow the existing OC2 timeline in order to ensure consistency with Generator submissions and the associated wider processes that dovetail with these submissions.

2. Clarification regarding the terms Interconnector Import/Export Capacity and what needs to be included in the Output Usable

The proposed definition of the Interconnector Export Capacity envisages that this data will represent "the maximum level at which the **External Interconnection** can export to the **Grid Entry Point**" (with similar interpretation for Interconnector Import Capacity). The required data is therefore indicative of the interconnector capability (taking into account any constraints) rather than its likely use.

3. Format for data submission

The Output Usable data is normally submitted by Generators in a 'Comma Separated Value' (CSV) format in three columns. The first column contains the identity of the BMU, the second column contains the data to which the output Usable data corresponds, and the third column contains the Output Usable value. It is envisaged that this format will be followed by Interconnector Owners.

The above information can be submitted either by uploading the CSV file or by directly inputting the data in a web-based screen.

If you have any further queries regarding submission of the data or would like to discuss details of the data submission process, please do not hesitate to contact me.

Thank you for taking time to respond to this consultation. Your comments will all be included in the associated Report to the Authority. It is National Grid's intention to submit the 'Report to the Authority' to OFGEM imminently.

Yours sincerely

Shafqat Ali
Senior Commercial Analyst, Electricity Codes

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9th December 2009

Dear John

Grid Code Consultation F/09

Grid Code changes relating to BSC proposal P243 - *Extension of OC2 obligations to include Interconnector Owners*

Thank you for your comments on the above Grid Code consultation received on 4th December 2009. We note that you are satisfied with the proposed changes but have comments relating to the "Interconnector Owner". These comments include:

- Alignment of the Grid Code and the CUSC definitions of Interconnector Owner;
- Use of "Interconnector" and/or "External Interconnection";
- Wider Grid Code obligations on Interconnector Owners;
- Obligations on Interconnector Owners and/or Externally Interconnected System Operators

1. Alignment between the Grid Code and the CUSC definitions of Interconnector Owner

The proposed Grid Code definition of the Interconnector Owner uses the same wording as the definition in the CUSC but replacing 'Interconnector' with 'External Interconnection' (The term External Interconnection is already defined in the Grid Code whilst Interconnector is not). The two definitions are intended to be the same.

We agree that there is potential for confusion and that the two definitions could be better aligned. We have revised the proposed Grid Code definition of Interconnector as "Has the meaning given to that term in the Connection and Use of System Code".

2. Use of "Interconnector" and/or "External Interconnection"

For consistency with the existing Grid Code terminology, the proposed text is only intended to use the term External Interconnection; any use of the term Interconnector (e.g. in OC2.1.3) is unintentional.

In light of your comment, we have reviewed the proposed legal text and have made the following changes to the proposed text:

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- In OC2.1.3, replace "Interconnector" with "Interconnector Owner";
- In OC2.4.1.2, replace "External Interconnector" with "External Interconnection";

3. Wider Grid Code obligations and/on Interconnector Owners

The changes proposed in the Grid Code industry consultation F/09 are related to BSC proposal P243 which requires publication of forward availability data. This data, along with outage information, is already provided by the Generators via OC2 but not by the Interconnector Owners. Consequently, F/09 aims to deliver P243 requirements and ensure consistency with related Generator obligations for outage information.

We agree that there may be other obligations that could be placed on Interconnector Owners. This would require a detailed review of the Grid Code and could be taken forward outside of F/09 consultation.

4. Obligations on Interconnector Owners and Externally Interconnected System Operators

Prior to consulting with the industry, we carefully considered whether the obligations to provide interconnector forward availability could be placed on Externally Interconnected System Operators (EISOs) such as RTE. We came to the conclusion that it would be more practical to place such obligations on a party (such as National Grid Interconnector Limited in the case of French Interconnector) that has a more direct relationship with National Grid and owns the particular interconnection assets that we are specifically interested in receiving the availability information for.

There should be no conflict between the obligations placed on Interconnector Owners and EISOs. The purpose of the liaison between Interconnector Owners and NGET is to co-ordinate the availability of the interconnectors with National Electricity Transmission System (along with generator availability). Details of these arrangements are covered in OC2.

In contrast, the purpose of the liaison between EISOs and NGET is to manage the utilisation of the available interconnector capacity for the purpose of operating the interconnected systems. We notify EISOs of any potential anticipated problems on National Electricity Transmission System (e.g. as stated in BC1.5.5(c)) so that the EISO is able to take steps on their system to be prepared to provide assistance if this became necessary. Details of these arrangements are covered in BC1.

Thank you for taking time to respond to this consultation. Your comments will all be included in the associated Report to the Authority. It is National Grid's intention to submit the 'Report to the Authority' to OFGEM imminently.

Yours sincerely

Shafqat Ali
Senior Commercial Analyst, Electricity Codes

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9th December 2009

Dear Gary,

Grid Code Consultation F/09

Grid Code changes relating to BSC proposal P243 - *Extension of OC2 obligations to include Interconnector Owners*

Thank you for your comments on the above Grid Code consultation received on 4th December 2009. We note that you support the F/07 proposal as it will enable delivery of the related BSC proposal P243 as well as providing information to the wider industry. We also note your support for F/09 even if P243 is rejected by the Authority.

Thank you for taking time to respond to this consultation. Your comments will all be included in the associated Report to the Authority. It is National Grid's intention to submit the 'Report to the Authority' to OFGEM imminently.

Yours sincerely

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H APPENDIX 4: POST-CONSULTATION PROPOSED GRID CODE CHANGES

Please See Separate Volume: Appendix 4