

Stage 03: Report to the Authority

Grid Code

A/11 Black Start: Amendments to Grid Code resulting from BSC modification P231

What stage is this document at?

01 Working Group Report

02 Industry Consultation

03 Report to the Authority

This proposal seeks to modify Grid Code to align it with the Balancing and Settlement Code (BSC) following the changes introduced through BSC modification P231.

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

Published on: 01 July 2011

Consultation Paper ref: A/11



High Impact:

National Grid & BSCCo



Medium Impact:

Generators, License Exemptible Generators, Licensed Distribution System Operators, Interconnector Administrators, Directly Connected Users & Interconnector Users



Low Impact:

A/11

Report to the Authority

01 July 2011

Version 1.0

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About this document

This Report to the Authority outlines a proposal to modify the Grid Code and contains the information required for The Authority to form an understanding of a defect within the Grid Code and the proposed solution in order to make a determination.

To modify the Grid Code a Modification Proposal must be taken to the Grid Code Review Panel (GCRP). This Modification Proposal will outline the background to the issue, how to address it, any impacts it may have on the industry and a recommendation for the GCRP to proceed to a Working Group or to an Industry Consultation.

The GCRP, based on the Modification Proposal, will determine if any further work or debate is required. If the group feels that the issue could benefit from further examination it will be progressed to a Working Group. Terms of Reference (ToR) will be created to outline the purpose and scope of the Working Group, as well as any timelines for reporting back to the GCRP. The Working Group will then meet to discuss the issue and produce a Working Group Report. This report is then presented to the GCRP to determine if the ToR have been met and that a robust solution has been developed to meet the defect within the Grid Code.

If the GCRP feels that the issue has already been investigated thoroughly and a robust solution has been developed, the Modification Proposal will progress to an Industry Consultation. Grid Code Industry Consultations last approximately one month but timescales can alter based on the complexity of the issue.

Following the conclusion of the Industry Consultation, a Report to the Authority is produced which takes into account any responses to the Industry Consultation and puts forward recommendations to Ofgem on how to address the defect within the Grid Code. The Authority then considers the issue and the proposed solutions to make a determination.

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 Authorised Electricity Operators will be notified by National Grid, in accordance with the Authority's approval.



Any Questions?

Contact:

Ben Smith



ben.smith@uk.ngrid.com



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Proposer:

Ben Smith

A/11

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1 Executive Summary

- 1.1 Following BSC modification P231 which aimed to improve transparency of arrangements and obligations associated with a Black Start or Fuel Security Code (FSC) event within the BSC, several recommendations were made to review OC9.4 of Grid Code and make the necessary changes to align it with the BSC.
- 1.2 Recommendations were presented at the February 2011 Grid Code Review Panel (GCRP) meeting that sought to align Grid Code with the BSC, following amendments made under Modification P231. The Panel agreed that the proposals should go out to industry consultation which closed on 6th May 2011. Three responses were received, which all contained support for the proposals.
- 1.3 The consultation recommended that the following changes are made to Grid Code:
 - Firstly, to include in section OC9.4.6 that National Grid Electricity Transmission will determine the time and date from which the Total Shutdown or Partial Shutdown commenced in regards to a Black Start event. The BSCCo will then be notified of this and will use it to determine the Settlement Period from which the Balancing Mechanism is suspended.
 - Secondly, an additional paragraph is required at the end of OC9.4.7.9 to ensure Users of Grid Code provide Physical Notifications ten hours prior to the market returning to normal operation. This is to ensure that the System Operator, National Grid, is then able to despatch parties to their intended position. Parties that don't provide PNs run the risk of being exposed to Imbalance Charges.
 - Finally, some minor housekeeping changes are required to amend an incorrect reference to the BSSCo in the first paragraph of section OC9.4.7.9, which should read BSCCo. There is also an 'and' at the end of point (c) also within section OC9.4.7.9, this should actually be at the end of point (d).
- 1.4 These recommendations are included in Section 3 of this document, with the proposed Grid Code legal text changes shown in Annex 3. National Grid recommends to the Authority that these recommendations be approved.

2 Purpose & Introduction

- 2.1 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 report on the outcome of such review;
 - 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
 - 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.
- 2.2 This review examines proposed amendments to the existing Grid Code provisions relating to a Black Start event and obligations on generators that are intended to clarify the requirements and assess that they still remain appropriate.
- 2.3 The proposed changes to the Grid Code were discussed with the Grid Code Review Panel (GCRP) on 17th February 2011. Panel Members agreed that National Grid should issue a Consultation Paper regarding the proposed changes. The Consultation closed on 6th May 2011.
- 2.4 The next stage is for National Grid to 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 the A/11 Consultation.
- 2.5 The Final Report will be published on the Grid Code webpage. 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 website.
- 2.6 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.

Background

- 2.7 The consultation presented the changes required to OC9.4 to bring the Grid Code in line with the Balancing and Settlement Code (BSC) as a result of BSC modification P231.
- 2.8 The aim of BSC Modification P231 was to improve the transparency of the arrangements and obligations associated with a Black Start or Fuel Security Code (FSC) event within the BSC. P231 was raised by National Grid in December 2008 with the solution being based on the discussions from BSC Issues 32 'Black Start' and 33 'Fuel Security Code'. The final proposal was approved in June 2009 and implemented in November 2009.

As a result of introducing P231, the BSC now provides clearer processes for the industry to follow in the event of a Black Start or FSC direction. The changes recommended in the consultation are in regards to a Black Start event only and are designed to align Grid Code with the BSC.

- 2.9 A 'Black Start' is a recovery process for restoring electricity on the Transmission System (and Distribution System) following a Total or Partial shutdown. Power stations connected to the de-energised part of the system are generally not capable of re-starting and rely on an 'external' source of electricity from the Transmission System (or Distribution System) to start up their generating units.
- 2.10 Certain power stations have contracts with the System Operator (National Grid) where they will be able to initiate a Black Start following a Total or Partial shutdown. These power stations do not require an external source of energy to produce electricity. In most instances, such power stations use open cycle gas turbines to start their main units. This station would then energise parts of the Transmission system and provide an 'external' source of electricity to start those power stations that don't have Black Start capability. These 'power islands' can gradually be developed further such that the Transmission System (and Distribution System) can be fully re-energised and then demand can be gradually re-connected.
- 2.11 As a result of the changes made to the BSC when P231 was approved by Ofgem, subsequent changes were recommended to OC9.4 of Grid Code to align both codes. Appendix 4 of P231 Assessment Report¹ flagged up these specific changes that were identified by the working group for further development. These changes were as follows:
- (a) Remove reference to BSCCo determining the start of a Black Start – Replace with the Transmission Company
 - (b) Possible requirement on National Grid to inform BSCCo when the Transmission System is energised following a Black Start
 - (c) Possible requirement on National Grid to notify BSCCo that the events which gave rise to the Black Start no longer exist and the market is capable of operating normally
 - (d) Requirement on Parties to use reasonable endeavours to submit Physical Notifications ten hours prior to the end of the Black Start

¹ <http://www.elexon.co.uk/Pages/P231.aspx>

3 Description of Proposed Modification and its Effects

3.1 Following discussions held at the Grid Code Review Panel meeting on the 17th February 2011 and discussion held ahead of this meeting between National Grid and Elexon, a consultation was issued with a recommendation that the proposed changes are carried out as outlined below.

3.2 In regards to the following recommendation:

- (a) Remove reference to BSCCo determining the start of a Black Start – Replace with the Transmission Company

Propose that a change to Grid Code is required. The change reflects that it is the responsibility of National Grid Electricity Transmission to determine the time and date of the Total or Partial shutdown and inform the BSCCo of that. Subsequently, BSCCo will use this information to determine the Settlement Period with effect from which the Balancing Mechanism is suspended. A recommendation was made to insert a paragraph into section OC9.4.6 to incorporate the proposed change. The proposed Grid Code drafting for the above change can be found in Annex 3.

3.3 In regards to the following recommendation:

- (b) Possible requirement on National Grid to inform BSCCo when the Transmission System is energised following a Black Start.

It was agreed that the existing wording within OC9.4.7.9 point (a) already covers in sufficient detail the notification to the BSCCo of the energisation status of the GB Transmission System. The current Grid Code text is shown below:

OC9.4.7.9

NGET shall, as soon as reasonably practical, inform Users and the BSCCo when the Total System could return to normal operation. Any such determination by NGET does not mean that the provisions of Section G paragraph 3 (Black Start) of the BSC shall cease to apply.

In making the determination that the Total System could return to normal operation, NGET, would consider, amongst other things, the following areas:

- (a) the extent to which the National Electricity Transmission System is contiguous and energised;*

It was agreed that this is already one of the considerations that National Grid makes in determining whether the Total System can return to normal operation. Therefore no Grid Code changes are proposed.

3.4 In regards to the following recommendation:

- (c) Possible requirement on National Grid to notify BSCCo that the events which gave rise to the Black Start no longer exist and the market is capable of operating normally

It was agreed that there was no requirement to alter the existing wording within Grid Code. It was agreed that this is sufficiently covered within OC9.4.7.9, which stipulates the physical considerations taken into account by National Grid when determining the Total system could return to normal

operation. It was also agreed that in some cases (e.g. human error) the events which gave rise to a Black Start event may in fact still exist but the system could return to normal operation. It was also noted that it is the BSC Panel's decision when the market is capable of operating normally and was not something National Grid would be able to determine.

3.5 In regards to the following recommendation:

- (d) Requirement on Parties to use reasonable endeavours to submit Physical Notifications ten hours prior to the end of the Black Start

P231 introduced a clear structure for Parties to follow in the event of a Black Start event. This involved establishing a point at which all Parties should use reasonable endeavours to submit Physical Notifications (PNs); this was agreed to be 10 hours prior to the market returning to normal operation and would be notified to Grid Code users by National Grid. This is to ensure that the System Operator, National Grid, is then able to despatch parties to their intended position. Parties that do not provide PNs run the risk of being exposed to Imbalance Charges. To ensure this is clear, we recommend that a paragraph is introduced into Grid Code at the end of section OC9.4.7.9 to incorporate the proposed change. The proposed Grid Code drafting for the above change can be found in Annex 3.

4 Consultation Responses

- 4.1 National Grid has consulted Authorized Electricity Operators (AEO) on this issue. Three responses were received. All responses are included in Annex 1 of the Report to the Authority, along with National Grid's replies to each AEO.
- 4.2 Respondent A/11-CR01 (SSE) is supportive of the proposals and agreed that it seemed a pragmatic approach which would better meet the requirements of the Grid Code.
- 4.3 Respondent A/11-CR02 (EDF) is supportive of the proposals and agreed the changes are necessary to align the Grid Code with the Balancing and Settlement Code.
- 4.4 Respondent A/11-CR03 (RWE) is supportive of the proposal and also recommended a minor amendment to the legal wording of the final paragraph in OC9.4.7.9 of Grid Code which is being proposed in recommendation (d).
- 4.5 National Grid believes the recommendation from respondent CR03 to amend the wording in recommendation (d), to introduce a new paragraph at the end of Grid Code section OC9.4.7.9 should be included and we have therefore altered the legal text set out in the recommendation to incorporate this. For clarity the original proposal set out in the consultation was as follows:

*Users shall use reasonable endeavours to submit **Physical notifications** ten hours prior to the start of the **Settlement Period** determined by the **BSC Panel** in accordance with paragraph G3.1.2(d) of the BSC, in preparation for a return to normal operations and as notified by **NGET** to **Users**.*

Respondent CR03 recommended the following change:

*Users shall use reasonable endeavours to submit **Physical notifications** ten hours prior to the start of the **Settlement Period** determined by the **BSC Panel** in accordance with paragraph G3.1.2(d) of the BSC **and as notified by **NGET** to **Users** in preparation for a return to normal operations and as notified by **NGET** to **Users**.***

5 Impacts & Assessment

5.1 Impact on National Electricity Transmission System (NETS)

The proposed changes will impact National Grid.

5.2 Impact on Grid Code Users

The proposed modification will impact Generators, Suppliers, License Exemptible Generators, Licensed Distribution System Operators, Interconnector Administrators, Interconnector Users and the BSCCo.

5.3 Impact on Greenhouse Gas emissions

The proposed modification will not have a material impact on Greenhouse Gas emission.

5.4 Assessment against Grid Code Objectives

National Grid considers that A/11 would better facilitate the Grid Code objectives:

- (i) to permit the development, maintenance and operation of an efficient, co-ordinated and economical system for the transmission of electricity;

Improved transparency of Users requirements resulting in better co-ordination of the Transmission System.

- (ii) to facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity) ; and

No additional benefit identified

- (iii) subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole.

Improves security of electricity generation on the Transmission System

5.5 Impact on Industry Documents

5.5.1 Impact on core industry documents

The proposed modification does not impact on any core industry documents, but brings the Grid Code more accurately aligned to the BSC

5.5.2 Impact on other industry documents

The proposed modification does not impact on any other industry documents.

Annex 1- Consultation responses

The following table provides a list of the responses received to the Grid Code Consultation, A/11. The full responses can be found below.

Reference	Company
A/11-CR-01	SSE
A/11-CR-02	EDF Energy
A/11-CR-03	RWE

Ireland, Tom

From: garth.graham@sse.com
Sent: 22 April 2011 13:56
To: Ireland, Tom
Subject: Re: Grid Code Consultation A/11 (consequential changes from BSC modification P231)

Dear Sirs,

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.

In relation to the consultation concerning Grid Code A/11 "Black Start: Amendments to Grid Code resulting from BSC modification P231" (issued 1st April 2011) we agree that this seems a pragmatic approach which would better meet the requirements of the Grid Code.

In coming to this conclusion we have been mindful of the changes introduced (into the BSC) by P231 and in particular the 'Black Start Recovery Process' set out in section 2.1 of BSC Procedure 201. Thus, for example, the requirement; outlined in paragraph 3.5 of the A/11 consultation document; concerning Parties using their reasonable endeavours to submit PNs ten hours prior to the end of the Black Start equates to "Point I" in the diagram on page 12 of the BSCP201 and thus assumes that Points A to H have been completed successfully (in order that Point I is reached).

We hope you find these comments helpful.

Regards

Garth Graham
 Scottish and Southern Energy plc

===

From: "Ireland, Tom" <thomas.ireland@uk.ngrid.com>
 To: "Smith, David M" <David.M.Smith@uk.ngrid.com>, <alan.d.barlow@magnoxsouthsites.com>, "Creighton, Alan" <Alan.Creighton@ce-electricuk.com>, <alan.kelly@sppowersystems.com>, <Alastair.Frew@ScottishPower.com>, <bvest@aepuk.com>, "Thornton, Bec" <Bec.Thornton@uk.ngrid.com>, <brian.punton@sse.com>, <david.carson@sppowersystems.com>, "Guy Nicholson" <Guy.Nicholson@senergyworld.com>, <john.lucas@elexon.co.uk>, <john.morris@british-energy.com>, <john.norbury@rwe.com>, <mkay@iee.org>, <Steve.Brown@ofgem.gov.uk>, "Curtis, Stephen" <stephen.curtis@uk.ngrid.com>, <tom.b.davies@magnoxnorthsites.com>, "Ireland, Tom" <thomas.ireland@uk.ngrid.com>, <xavier.pinchaux@rte-france.com>
 Cc: <alan.michie@sppowersystems.com>, <campbell.mcdonald@scottish-southern.co.uk>, "Phillips, Guy" <Guy.Phillips@eon-uk.com>, "Barrett, Jim" <Jim.Barrett@centrica.com>, <kathryn.coffin@elexon.co.uk>, <Min.Zhu@ofgem.gov.uk>, <neil.sandison@sse.com>, <richard.lowe@sse.com>, "Robin McCormick - SONI" <robin.mccormick@soni.ltd.uk>, <Shijun.Yi@ofgem.gov.uk>, <Sigrid.bolik@repower-uk.co.uk>, "Derry, Thomas" <thomas.derry@uk.ngrid.com>
 Date: 01/04/2011 16:35
 Subject: Grid Code Consultation A/11 (consequential changes from BSC modification P231)

Please find attached below a link to the Grid Code Consultation (A/11) relating to consequential changes from BSC Modification P231 (Black Start). Responses should be sent to ben.smith@uk.ngrid.com by **Friday 6th May**.

Link to Grid Code Consultation page:

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

01/07/2011

Ireland, Tom

From: Morris John [john.morris@edf-energy.com]
Sent: 06 May 2011 11:39
To: Smith, Ben
Cc: ^t&ta@edfenergy.com; Sanchez-Lopez Diego @ EDF Energy
Subject: Grid Code Consultation A/11 (consequential changes from BSC modification P231)

Dear Ben,

Thankyou for the opportunity to comment on this consultation. EDF Energy has followed the changes to the Black Start arrangements in the BSC and agrees that the consequential changes to Grid Code OC9.4 are the minimum necessary to align the Grid Code with the Balancing and Settlement Code. We understand that there are some concerns about the need to suspend the Balancing Mechanism for a Local Shutdown and that an examination of this will form part of a forthcoming working group.

Yours sincerely

John MORRIS
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Ireland, Tom

From: john.norbury@rwe.com
Sent: 23 May 2011 17:11
To: Ireland, Tom; Smith, Ben
Subject: RWE Response - Grid Code Consultation A/11 (consequential changes from BSC modification P231)

Ben / Tom

I appreciate this consultation closed on the 6th May but I don't recall sending any comments from RWE. If not too late, the only comment I had was that the clarity of the last paragraph may benefit from a minor tweak which you may wish to consider, i.e.

*"Users shall use reasonable endeavours to submit **Physical notifications** ten hours prior to the start of the **Settlement Period** determined by the **BSC Panel** in accordance with paragraph G3.1.2(d) of the BSC and as notified by NGET to Users, in preparation for a return to normal operations ~~and as notified by NGET to Users~~."*

Kind Regards

John Norbury
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01/07/2011

Annex 2- National Grid's replies

The following table provides a list of the replies that National Grid has made to the consultation responses to Consultation, A/11. The full replies can be found below

Reference	Company
A/11-CR-01	SSE
A/11-CR-02	EDF Energy
A/11-CR-03	RWE

Garth Graham
By email: garth.graham@sse.com

Ben Smith
Commercial Analyst

Ben.smith@uk.ngrid.com
Direct tel +44 (0)1926 65 5836
Direct fax +44 (0)1926 65 6521

www.nationalgrid.com

1st July 2011

Ref: A/11-CR-01

Dear Garth,

A/11 Black Start: Amendments to Grid Code resulting from BSC modification P231

Thank you for your response on 22nd April 2011 to our consultation on proposals to modify the Grid Code relating to a Black Start event, Grid Code Consultation A/11.

National Grid received a positive response from the industry with representations being received from three industry parties. All the responses supported the recommendations of the proposal and recommended its implementation.

I anticipate the publication of the Final Report to the Authority later this week. If you have any queries or outstanding issues please contact me at ben.smith@uk.ngrid.com

Yours sincerely

Ben Smith

Commercial Analyst
Electricity Codes
National Grid

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1st July 2011

Ref: A/11-CR-02

Dear John,

A/11 Black Start: Amendments to Grid Code resulting from BSC modification P231

Thank you for your response on 6th May 2011 to our consultation on proposals to modify the Grid Code relating to a Black Start event, Grid Code Consultation A/11.

National Grid received a positive response from the industry with representations being received from three industry parties. All the responses supported the recommendations of the proposal and recommended its implementation.

I anticipate the publication of the Final Report to the Authority later this week. If you have any queries or outstanding issues please contact me at ben.smith@uk.ngrid.com

Yours sincerely

Ben Smith

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1st July 2011

Ref: A/11-CR-03

Dear John,

A/11 Black Start: Amendments to Grid Code resulting from BSC modification P231

Thank you for your response on 23rd May 2011 to our consultation on proposals to modify the Grid Code relating to a Black Start event, Grid Code Consultation A/11.

National Grid received a positive response from the industry with representations being received from three industry parties. All the responses supported the recommendations of the proposal and recommended its implementation.

In response to the specific comments you raised in your consultation response, you identified that it would be clearer if the new paragraph that is being recommended to be inserted at the end of OC.9.4.7.9, was amended slightly. I agree with your recommendation and have altered the wording in the Final Report to the Authority to reflect this.

I anticipate the publication of the Final Report to the Authority later this week. If you have any queries or outstanding issues please contact me at ben.smith@uk.ngrid.com

Yours sincerely

Ben Smith

Commercial Analyst
Electricity Codes
National Grid

OPERATIONAL CODE

OC9.4.6 Black Start Situation

*In the event of a **Total Shutdown** or **Partial Shutdown**, NGET will, as soon as reasonably practical, inform **Users** (or, in the case of a **Partial Shutdown**, **Users** which in NGET's opinion need to be informed) and the **BSCCo** that a **Total Shutdown**, or, as the case may be, a **Partial Shutdown**, exists and that NGET intends to implement a **Black Start**. NGET shall (as soon as is practicable) determine, in its reasonable opinion, the time and date with effect from which the **Total Shutdown** or **Partial Shutdown** commenced and inform **BSCCo** of that time and date. Following such notification, in accordance with the provisions of the **BSC**, the **BSCCo** may will determine the Settlement Period time with effect from which the **Balancing Mechanism** is suspended.*

OC9.4.7.9 ***NGET** shall, as soon as reasonably practical, inform **Users** and the **BSCCo** when the **Total System** could return to normal operation. Any such determination by **NGET** does not mean that the provisions of Section G paragraph 3 (Black Start) of the **BSC** shall cease to apply.*

*In making the determination that the **Total System** could return to normal operation, **NGET**, would consider, amongst other things, the following areas:*

- (a) the extent to which the **National Electricity Transmission System** is contiguous and energised;*
- (b) the integrity and stability of the **National Electricity Transmission System** and its ability to operate in accordance with the **Licence Standards**;*
- (c) the impact that returning to normal may have on transmission constraints and the corresponding ability to maximise the **Demand** connected; ~~and~~*
- (d) the volume of generation or **Demand** not connected to the **National Electricity Transmission System**; and*
- (e) the functionality of normal communication systems (i.e. EDT, **Control Telephony**, etc).*

*For the avoidance of doubt, until the Conclusion of the **Black Start** the **Balancing Mechanism** is unlikely to be operational and **NGET** is likely to continue to issue **Emergency Instructions** in accordance with BC2.9.*

***Users** shall use reasonable endeavours to submit **Physical notifications** ten hours prior to the start of the **Settlement Period** determined by the **BSC Panel** in accordance with paragraph G3.1.2(d) of the **BSC** and as notified by **NGET** to **Users**, in preparation for a return to normal operations.*