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to customers*

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10 June 2005

Dear Ben

#### **STANDARD CONDITION C14 : TRANSMISSION LICENCE, LICENSEE'S GRID CODE**

Decisions in relation to consultation A/05 "Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Intertripping Schemes"

The Gas and Electricity Markets Authority (the "Authority")<sup>1</sup> has carefully considered the changes that NGC<sup>2</sup> has proposed to its Grid Code as set out in the report to the Authority arising from consultation A/05<sup>3</sup> ("Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Intertripping Schemes") that has been submitted to it for approval.

The Authority has decided to approve the proposed changes to the Licensee's Grid Code (the "Grid Code") set out in Appendix A2 of the report to the Authority arising out of consultation A/05 subject to the amendments set out in Appendix 1 of this letter.

This document explains the background to the proposals and sets out the Authority's reasons for its decisions to approve these changes to the Grid Code. This letter constitutes notice by the Authority under Section 49A of the Electricity Act 1989 in relation to the directions contained or referred to in this letter.

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<sup>1</sup> The terms "Ofgem" and "the Authority" are used interchangeably in this letter. Ofgem is the office of the Authority.

<sup>2</sup> National Grid Company plc

<sup>3</sup> Report from NGC – Consultation Reference A/05, Issue 1, Date of Issue 11 March 2005  
([http://www.nationalgrid.com/uk/indinfo/grid\\_code/pdfs/Report\\_to\\_the\\_Authority\\_A05.pdf](http://www.nationalgrid.com/uk/indinfo/grid_code/pdfs/Report_to_the_Authority_A05.pdf)).

## **Background to the proposed changes to NGC's Grid Code**

NGC has reviewed the Grid Code and identified changes that it considers would be required as a consequence of CUSC Amendment Proposal CAP076 ("Treatment of System to Generator Intertripping Schemes"). NGC considers that if CAP076 is approved then in order to make those changes effective, amendments will be required to the Grid Code. NGC has proposed two alternative Grid Code amendment proposals either of which it believes would achieve this.

NGC states that the majority of the Grid Code changes proposed are common to both of the options described in its report. Changes are proposed in both options to:-

- The Connection Conditions (CCs) to clarify that System to Generator Operational Intertripping Schemes may need to be installed and to include System to Generator Operational Intertrip in the list of Part 2 Ancillary Services.
- Operating Code 2 (OC2) to include information about the use of operational intertripping in the information NGC provides to users as part of the transmission system outage planning process.
- Balancing Code 1 (BC1) so that an instruction to arm an operational intertrip would not be classed as a special action.
- Changes to BC2 to reflect the new CUSC payment mechanisms, to introduce a new requirement for a BM participant to re-declare Maximum Export Level following the operational intertripping of its generating plant, to reference the arming arrangements for System to Generator Operational Intertripping Schemes, to clarify that an operational intertrip is not considered to be an Emergency Instruction, to ensure references are consistently to "arming and disarming" of System to Generator Operational Intertripping Schemes and to include System to Generator Operational Intertripping in the list of Part 2 Ancillary Services.

NGC notes that the two Grid Code change proposal options in its report differ only in the proposed changes to the Glossary and Definitions. Appendix A1 proposes additional definitions for System to Generator Operational Intertripping and System to Generator Operational Intertripping Schemes that cross refer to the CUSC definitions (that form part of the CAP076 proposed changes). Appendix A2 proposes changes to the Glossary and Definitions to define System to Generator Operational Intertripping, System to Generator Operational Intertripping Schemes and the intertrip categories within the Grid Code. NGC notes that should the Authority approve the changes to the Grid Code set out in Appendix A2 then it would propose an amendment to remove the category definitions from the CUSC in the future.

NGC reported that it received 7 responses to consultation A/05 from authorised electricity operators and that:-

- 1 of the responses was commercial in nature and the points raised were considered by NGC as part of the CAP076 report and not in the A/05 report.
- 6 respondents supported the inclusion of intertrip related definitions in the Grid Code (Appendix A2 text).
- 3 respondents supported the proposed changes to the Grid Code.
- 2 respondents noted concern about the definition of Category 1 Intertripping Schemes which they considered to be unclear.
- 1 respondent suggested some clarification to the definition of System to Generator Operational Intertripping Schemes.

- 3 respondents supported the proposed changes to OC2 considering that this would provide useful operational planning information for generating sites where operational intertrips are installed.
- 2 respondents opposed the change to BC1.7 stating that as the increased risk of full load rejection following the arming of an operational intertrip was not a normal operational action and should therefore be considered as a special action.
- 1 respondent objected (and one other expressed concern) to the proposed changes to BC2 to remove the current arrangement for the operation of an intertrip to be treated as a Bid-Offer Acceptance. These respondents considered that the changes were inappropriate since CAP076 is not expected to be applied retrospectively.
- 1 other respondent (who was supportive of the intention of CAP076) noted a preference for a delayed implementation to allow for sufficient time for generators and NGC to put in place appropriate contractual arrangements.
- 1 respondent highlighted the lack of explanation in the Grid Code about the different types of intertrip schemes that may be required and another respondent noted concern about the absence of any technical standards or engineering risk assessments relating to the specification of intertrip schemes.
- 1 respondent noted concern about a difference between NGC's and the generators' interpretation of CC8.1 that had been identified in discussion of his response to the A/05 consultation.
- 1 respondent highlighted a difference in interpretation of BC2.8.3(a) relating to the nature of safety grounds that would justify a generator refusing an NGC instruction to arm an intertrip, that had been identified in discussion of his response to the A/05 consultation.

### **NGC's recommendation**

NGC recommends that the Authority approve either of the options for changes to the Grid Code set out in the report to the Authority arising from consultation A/05 ("Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Intertripping Schemes").

## Ofgem's view

The reasons for the Authority's decision to approve the proposals to introduce an administered payment scheme as a compensation mechanism for operational intertrips are set out in the decision letter relating to CUSC Amendment Proposal CAP076. These reasons are not repeated in this letter (except where they apply directly to the proposed Grid Code changes or the response NGC received to the associated consultation). In reaching its decision to approve the A/05 amendment proposals Ofgem has considered the requirements to amend the Grid Code in the light of the Authority's approval of the Original Proposed Amendment set out in CAP076. The A/05 decision is not a decision on the merits of those proposals but rather is based upon their effective implementation. It is noted that the A/05 proposals would not be appropriate if the Original Proposed Amendment set out in CAP076 is not implemented.

The proposed changes by NGC are set out in its report to the Authority as required by standard condition C14(2) of NGC's electricity transmission licence. Approval of these changes by the Authority is required by standard condition C14(3). Ofgem considers that, having had regard to the licensee's obligations set out in condition C14(1)(b)<sup>4</sup> of the Transmission Licence ("the obligations") and Ofgem's wider statutory duties, that the proposed changes to the Grid Code should be approved by the Authority. Ofgem's reasons for reaching this decision are outlined below.

Ofgem is aware of the importance to NGC of the availability of System to Generator Operational Intertripping Schemes when NGC discharges its obligations in relation to the transmission system security and quality of supply and in relation to facilitating competition in generation and supply of electricity. Ofgem also acknowledges the importance to Generators of information that describes the likely future requirements to arm an operational intertrip when planning the economic operation of generating plant.

Ofgem notes that one of the responses to consultation A/05 was commercial in nature and acknowledges that all the points in that response were included within the report to the Authority relating to CAP076.

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<sup>4</sup> The licensee's transmission licence defines the Grid Code objectives as follows:

- (i) to permit the development, maintenance and operation of an efficient, co-ordinated and economical system for the transmission of electricity;
- (ii) to facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the GB 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
- (iii) subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in Great Britain taken as a whole.

Ofgem notes the respondents' preference for the changes proposed in Appendix A2 and considers there to be value in those technical definitions being included within the Grid Code given the level of relevant expertise within the Grid Code governance arrangements. Ofgem acknowledges NGC's offer to raise a CUSC amendment proposal to amend the definitions in the CUSC to minimise future change co-ordination issues should the Grid Code changes in Appendix A2 be approved. Ofgem is concerned that a number of respondents have raised concerns about the clarity of the definition of Category 1 Intertripping Scheme and acknowledges that the clarity concerns relate to interpretation of the Security and Quality of Supply Standard ("SQSS"). Ofgem notes that the respondent states that work relating to the interpretation of the SQSS is wider than the Grid Code governance and should be progressed at an alternative forum. Ofgem also notes NGC's view that the proposed definition is sufficiently clear. Ofgem considers that the proposed Grid Code definition of Category 1 Intertripping Scheme links clearly to the SQSS, but notes that the Grid Code definition may require further review in the future, in light of work relating to the interpretation of the relevant criteria in the SQSS.

Ofgem acknowledges the objections to the proposed changes to BC1.7. Ofgem has considered the existing provisions of BC1.7 and notes that this clause relates to the agreement of actions pre or post fault that NGC needs to be taken by a user to protect the integrity of the transmission system. Ofgem also notes that implementation of CAP076 will treat the use of operational intertripping as an ancillary service, the details of which will be documented in a bilateral agreement between a generator and NGC. Whilst Ofgem agrees that full load rejection of a generator is not an operation that a user would normally plan to undertake, Ofgem understands that where an operational intertripping scheme was installed, the generating plant would be designed to safely withstand such an operation. As such, Ofgem considers that the proposed change to BC1.7 is appropriate.

In relation to the respondent's concern that the proposed Grid Code changes do not include any technical standards or engineering risk assessments relating to the specification of the intertripping scheme, Ofgem notes that such specifications can be site specific and are included as part of the specific bilateral connection agreement for the site. Ofgem considers that there may not be a common specification for System to Generator Operational Intertrip Schemes and that if this is the case then it is not inappropriate for specific requirements to be agreed on a bilateral basis. However, Ofgem shares the concern of the respondent about the lack of transparency of such arrangements. Ofgem notes that the Governance of Electrical Standards procedure set out in the Grid Code (GC11) allows for NGC or any User to propose changes to the list of Electrical Standards set out in the Annex to the General Conditions of the Grid Code. Ofgem considers that any common specification for operational intertripping schemes that may be developed could be considered in accordance with this Governance of Electrical Standards procedure.

Ofgem notes the concerns raised by respondents about apparent differences in interpretation of the existing Grid Code clauses CC8.1 and BC2.8.3(a). Ofgem agrees that there would be merit in further discussion of these clauses at a GCRP meeting as suggested by one of the respondents. In general, Ofgem considers that additional clarity in the Grid Code would contribute to the efficiency of NGC's operation of the transmission system and promote the security of the electricity system as a whole.

Ofgem asked NGC to review the proposed drafting for the changes set out in the reports to the Authority arising from consultation A/05 (“Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Intertripping Schemes”) in light of the changes to the Grid Code following the Authority’s direction of changes to the Grid Code arising from its conclusions relating to the treatment of embedded exemptable large power stations (EELPS) under BETTA that were implemented on 4 March 2005 and the Authority’s approval of the changes set out in report to the Authority H/04<sup>5</sup> (“Grid Code Changes to Incorporate New Generation Technologies and DC Interconnectors (Generic Provisions)”) that were implemented on 1 June 2005. As part of this review, NGC identified minor typographical errors in the sub-numbering of the changes proposed to CC6.2.3.2 in its report to the Authority. NGC has subsequently provided revised drafting that highlights the proposed changes against Issue 3, Revision 10 of the Grid Code and corrects the identified typographical errors, which is included as an Appendix to this letter. Ofgem does not consider that there are significant differences between the drafting of Appendix A2 in A/05 Version 1 and that contained in the Appendix to this letter.

### **The Authority’s decision**

Based on the reasons set out above the Authority has therefore decided to approve the Grid Code changes set out in Appendix A2 of the report submitted to the Authority arising from consultation A/05 (“Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Intertripping Schemes”) subject to the amendments set out in Appendix 1 that reflect the changes made to the Grid Code arising from:-

- the Authority’s direction of changes in relation to its conclusions relating to the treatment of embedded exemptable large power stations (EELPS) under BETTA that were implemented on 4 March 2005.
- Consultation H/04 (“Grid Code Changes to Incorporate New Generation Technologies and DC Interconnectors (Generic Provisions)”) that were implemented on 1 June 2005.
- NGC’s correction of typographical errors in the proposed text for CC6.2.3.2.

The implementation date for these Grid Code changes is 25 business days after the date of this letter.

Please do not hesitate to contact me on the above number if you have any queries in relation to the issues raised in this letter or alternatively contact Bridget Morgan on 020 7901 7080.

Yours sincerely

A handwritten signature in black ink that reads "John Scott". The signature is written in a cursive style and is underlined with a single horizontal line.

**John Scott**  
**Technical Director**

Signed on behalf of the Authority and authorised for that purpose by the Authority

cc: David Payne, GCRP Secretary

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<sup>5</sup> [http://www.nationalgrid.com/uk/indinfo/grid\\_code/pdfs/H04\\_Authrep\\_v1.pdf](http://www.nationalgrid.com/uk/indinfo/grid_code/pdfs/H04_Authrep_v1.pdf)

Appendix 1 – Amendment to Changes Proposed in the Report to the Authority Arising from Consultation A/05 (“Grid Code changes consequential to CUSC Amendment Proposal CAP076 – Treatment of System to Generator Intertripping Schemes”)

**Extract from the Glossary And Definitions**

<b><u>Category 1 Intertripping Scheme</u></b>	<b><u>A System to Generator Operational Intertripping Scheme arising from a Variation to Connection Design following a request from the relevant User which is consistent with the criteria specified in the Security and Quality of Supply Standard.</u></b>
<b><u>Category 2 Intertripping Scheme</u></b>	<b><u>A System to Generator Operational Intertripping Scheme which is:-</u></b> <b><u>(i) required to alleviate an overload on a circuit which connects the Group containing the User’s Connection Site to the GB Transmission System; and</u></b> <b><u>(ii) installed in accordance with the requirements of the planning criteria of the Security and Quality of Supply Standard in order that measures can be taken to permit maintenance access for each transmission circuit and for such measures to be economically justified,</u></b> <b><u>and the operation of which results in a reduction in Active Power on the overloaded circuits which connect the User’s Connection Site to the rest of the GB Transmission System which is equal to the reduction in Active Power from the Connection Site (once any system losses or third party system effects are discounted).</u></b>
<b><u>Category 3 Intertripping Scheme</u></b>	<b><u>A System to Generator Operational Intertripping Scheme which, where agreed by NGC and the User, is installed to alleviate an overload on, and as an alternative to, the reinforcement of a third party system, such as the Distribution System of a Public Distribution System Operator.</u></b>
<b><u>Category 4 Intertripping Scheme</u></b>	<b><u>A System to Generator Operational Intertripping Scheme installed to enable the disconnection of the Connection Site from the GB Transmission System in a controlled and efficient manner in order to facilitate the timely restoration of the GB Transmission System.</u></b>
<b><u>Group</u></b>	<b><u>Those GB Transmission System sub-stations bounded solely by the faulted circuit(s) and the overloaded circuit(s) excluding any third party connections between the Group and the rest of the GB Transmission System, the faulted circuit(s) being a Secured Event.</u></b>

Secured Event Has the meaning set out in the **Security and Quality of Supply Standard**.

Security and Quality of Supply Standard The version of the document entitled 'Security and Quality of Supply Standard' established pursuant to the **Transmission Licence** in force at the time of entering into the relevant **Bilateral Agreement**.

System to Generator Operational Intertripping A **Balancing Service** involving the initiation by a **System to Generator Operational Intertripping Scheme** of automatic tripping of the **User's** circuit breaker(s) resulting in the tripping of **BM Unit(s)** or (where relevant) **Generating Unit(s)** comprised in a **BM Unit** to prevent abnormal system conditions occurring, such as over voltage, overload, **System** instability, etc, after the tripping of other circuit-breakers following power **System** fault(s):

System to Generator Operational Intertripping Scheme A **System to Generating Unit** or **System to CCGT Module Intertripping Scheme** forming a condition of connection and specified in Appendix F3 of the relevant **Bilateral Agreement**, being either a **Category 1 Intertripping Scheme**, **Category 2 Intertripping Scheme**, **Category 3 Intertripping Scheme** or **Category 4 Intertripping Scheme**.

### Extract from the Connection Conditions

#### CC.6.2.3.2 Fault Disconnection Facilities

- (a) Where no **Transmission** circuit breaker is provided at the **User's** connection voltage, the **User** must provide **NGC** with the means of tripping all the **User's** circuit breakers necessary to isolate faults or **System** abnormalities on the **GB Transmission System**. In these circumstances, for faults on the **User's System**, the **User's Protection** should also trip higher voltage **Transmission** circuit breakers. These tripping facilities shall be in accordance with the requirements specified in the **Bilateral Agreement**.
- (b) **NGC** may require the installation of a **System to Generator Operational Intertripping Scheme** in order to enable the timely restoration of circuits following power **System** fault(s). These requirements shall be set out in the relevant **Bilateral Agreement**.

...

### System to Generator Operational Intertripping Scheme

CC.6.3.17 NGC may require that a **System to Generator Operational Intertripping Scheme** be installed as part of a condition of the connection of the **Generator**. **Scheme specific details shall be included in the relevant **Bilateral Agreement**.**

...

### CC.8.1 System Ancillary Services

The **CC** contain requirements for the capability for certain **Ancillary Services**, which are needed for **System** reasons...

#### Part 2

(c) **Frequency Control** by means of **Fast Start** - CC.6.3.14

(d) **Black Start Capability** - CC.6.3.5

(e) **System to Generator Operational Intertripping**

### Extract from OC2

OC2.4.1.3.2 In each calendar year:

...

(e) By the end of week 34

NGC will draw up a draft **GB Transmission System** outage plan covering the period Years 2 to 5 ahead and NGC will notify each **Generator** and **Network Operator** in writing of those aspects of the plan which may operationally affect such **Generator** (other than those aspects which may operationally affect **Embedded Small Power Stations** or **Embedded Medium Power Stations**) or **Network Operator**. NGC will also indicate where a need may exist to issue other operational instructions or notifications (including but not limited to the requirement for the arming of an **Operational Intertripping scheme**) or **Emergency Instructions** to **Users** in accordance with **BC2** to allow the security of the **GB Transmission System** to be maintained within the **Licence Standards**.

OC2.4.1.3.3 **Operational Planning Phase** - Planning for **Financial Year 1** ahead

...

(h) By the end of week 49

...

- (ii) **NGC** will notify each **Generator** and each **Network Operator** in writing of those aspects of the plan which may operationally affect such **Generator** (other than those aspects which may operationally affect **Embedded Small Power Stations** or **Embedded Medium Power Stations**) or **Network Operator** including in particular proposed start dates and end dates of relevant **GB Transmission System** outages. **NGC** will also indicate where a need may exist to issue other operational instructions or notifications (including but not limited to the requirement for the arming of an **Operational Intertripping scheme**) or **Emergency Instructions to Users** in accordance with **BC2** to allow the security of the **GB Transmission System** to be maintained within the **Licence Standards**. **NGC** will also inform each relevant **Non-Embedded Customer** of the aspects of the plan which may affect it.

OC2.4.1.3.4 **Operational Planning Phase - Planning in Financial Year 0 down to the Programming Phase (and in the case of load transfer capability, also during the Programming Phase)**

(d) ...

- (iii) The provisions of OC2.4.1.3.3(i)(z)(2), (3) and (5) shall apply to the provision of data under this part of OC2.4.1.3.4(d) as if set out in full.

**NGC** will also indicate where a need may exist to issue other operational instructions or notifications (including but not limited to the requirement for the arming of an **Operational Intertripping scheme**) or **Emergency Instructions to Users** in accordance with **BC2** to allow the security of the **GB Transmission System** to be maintained within the **Licence Standards**.

OC2.4.1.3.5 **Programming Phase**

(a) By ...

- (ii) **NGC** will notify each **Generator**...  
... and (y) (if OC2.4.1.3.3(i)(z) does not apply).

**NGC** will also indicate where a need may exist to use an **Operational Intertripping scheme**, emergency switching, emergency **Demand** management or other measures including the issuing of other operational instructions or notifications or **Emergency Instructions to Users** in accordance with **BC2** to allow the security of the **GB Transmission System** to be maintained within the **Licence Standards**.

## Extract from BC1

### BC1.7 Special Actions

- BC1.7.1 **NGC** may need to identify special actions (either pre- or post-fault) that need to be taken by specific **Users** in order to maintain the integrity of the **GB Transmission System** in accordance with the **Licence Standards** and **NGC Operational Strategy**.
- (a) For a **Generator** special actions will generally involve a **Load** change or a change of required Notice to Deviate from Zero NDZ, in a specific timescale on individual or groups of **Gensets**. ~~They may also include selection of "System to Genset" or "System to CCGT Unit", as the case may be, intertrip schemes for stability or thermal reasons.~~

## Extract from BC2

- BC2.5.2.3 **BM Participants** must only **Synchronise** or **De-Synchronise BM Units** (or in the case of a **Cascade Hydro Scheme** a **Generating Unit**);
- (a) at the times indicated to **NGC**, or
- (b) at times consistent with variations in output or input arising from provisions described in BC2.5.1,
- (within a tolerance of +/- 5 minutes) or unless that occurs automatically as a result of ~~intertrip schemes~~ **Operational Intertripping** or **Low Frequency Relay** operations or an **Ancillary Service** pursuant to an **Ancillary Services Agreement**. ~~For a **BM Unit** in relation to which the intertrip has been instructed to be switched into service under BC2.10 in order to protect the **GB Transmission System**, if it is **De-Synchronised** due to an operation of the intertrip that is not due to a fault at the **BM Unit** then a **Bid-Offer Acceptance** will be treated as having been issued. This will reflect the operation of the intertrip in order to form the **Bid-Offer Acceptance** data to be given to the **BMRA** under the **BSC**.~~

...

- BC2.5.3.1 At any time, any **BM Participant** (or the relevant person on its behalf) may, in respect of any of its **BM Units**, submit to **NGC** the data listed in **BC1**, Appendix 1 under the heading of **Dynamic Parameters** from the **Control Point** of its **BM Unit** to amend the data already held by **NGC** (including that previously submitted under this BC2.5.3.1) for use in preparing for and operating the **Balancing Mechanism**. The change will take effect from the time that it is received by **NGC**. For the avoidance of doubt, the **Dynamic Parameters** submitted to **NGC** under BC1.4.2(e) are not used within the current **Operational Day**. The **Dynamic Parameters** submitted under this BC2.5.3.1 shall reasonably reflect the true current operating characteristics of the **BM Unit** and shall be prepared in accordance with **Good Industry Practice**.

Following the **Operational Intertripping** of a **System to Generating Unit** or a **System to CCGT Module**, the **BM Participant** shall as soon as reasonably practicable re-declare its MEL to reflect more accurately its output capability.

...

BC2.8.1 Call-off of **Ancillary Services** by **NGC**

(a) **Ancillary Service** instructions may be issued at any time.

...

(f) **A System to Generator Operational Intertripping Scheme** will be armed in accordance with BC2.10.2 (a)

...

BC2.9.3.2 In the case of a **Generator**, **Emergency Instructions** may include:

(a) an instruction to trip one or more **Gensets** (excluding **Operational Intertripping**); or

...

BC2.10.2 Such instructions or notifications may include:

Intertrips

(a) an instruction to arm or disarm ~~switch into or out of service~~ an **Operational Intertripping** scheme;

...

BC2.10.3 Where an instruction or notification under BC2.10.2 ~~(a)~~-(c) or (d) results in a change to the input or output level of the **BM Unit** then **NGC** shall issue a **Bid-Offer Acceptance** or **Emergency Instruction** as appropriate.

...

Appendix 2 - Type and Form of **Ancillary Service** Instructions

BC2.A.2.1 This part of the Appendix consists of a non-exhaustive list of the forms and types of instruction for a **Genset** to provide **System Ancillary Services**. There may be other types of **Commercial Ancillary Services** and these will be covered in the relevant **Ancillary Services Agreement**.

As described in CC.8, **System Ancillary Services** consist of Part 1 and Part 2 **System Ancillary Services**.

...

Part 2 System Ancillary Services comprise:

- (c) **Frequency Control by means of Fast Start.**
- (d) **Black Start Capability**
- (e) **System to Generator Operational Intertipping**