

## Stage 03: Report to the Authority

Grid Code

# C/10 Grid Code Requirement for Electronic Communication Facilities between NGET and BM Participants

What stage is this document at?

01 Working Group Report

02 Industry Consultation

03 Report to the Authority

This proposal seeks to modify the Grid Code to clarify the requirements to install an automatic logging device.

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

Published on: 04 August 2011



**National Grid recommends:**

That C/10 is implemented to clarify the requirement within the Grid Code to install an automatic logging device



**High Impact:**

National Grid Electricity Transmission



**Medium Impact:**

Large Generators



**Low Impact:**

None identified

C/10 Report to the Authority

04 August 2011

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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 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 Working Group Report is then presented to the GCRP to determine if the Terms of Reference have been met and whether a robust solution has been developed to meet the defect within the Grid Code.

If the GCRP feels that the issue has 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 Authority on how to address the defect within the Grid Code. The Authority then considers the issue and the proposed solutions to make a determination.



### Any Questions?

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Authority

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## 1 Executive Summary

- 1.1 C/10 was raised at the May 2010 GCRP to address a defect within the Grid Code regarding the requirement to install an automatic logging device.
- 1.2 The principal means in which National Grid Electricity Transmission (NGET), as System Operator, access balancing services is via Electronic Despatch Logging (EDL). EDL is the means by which instructions are issued by NGET and certain data is submitted by Generators. Within the Grid Code, EDL is known as an 'automatic logging device' and Control Telephony is used as a backup in the event of a failure of EDL.
- 1.3 Currently the requirement to install an automatic logging device is linked to a User's participation in the Balancing Mechanism. There is no clear requirement to have an automatic logging device installed for the despatch of balancing services which results in an inefficient approach of despatch by telephone.
- 1.4 NGET has reviewed the requirements under the Grid Code and proposes that a User will be required to have an automatic logging device installed if:
  - they wish to actively participate in the Balancing Mechanism; or
  - they are required to provide both Part 1 System Ancillary Services, namely Frequency Response and Reactive Power.
- 1.5 NGET may waive or delay the requirement to install an automatic logging device should it be deemed inefficient. This does not apply to participation in the Balancing Mechanism.
- 1.6 NGET published an Industry Consultation, for a period of 20 business days, which closed on 18<sup>th</sup> July 2011. Three responses were received, all of which were supportive of the proposed changes.
- 1.7 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.

## 2 Introduction

- 2.1 This Report to the Authority is issued by National Grid under Condition C14 of the Transmission Licence granted to National Grid Electricity Transmission plc ("National Grid").
- 2.2 Paragraph 1 (b) of C14 states that National Grid shall have a Grid Code which is designed so as:
- (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 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
  - (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.
- 2.3 Paragraph 2 of Condition C14 provides that National Grid shall (in consultation with Authorised Electricity Operators liable to be materially affected thereby) periodically review (including upon the request of the Authority) the Grid Code and its implementation. That paragraph also requires National Grid, following such review, to send to the Authority:-
- (i) a report on the outcome of such review; and
  - (ii) any proposed revisions to the Grid Code from time to time as National Grid (having regard to the outcome of such review) reasonably thinks fit for the achievement of the objectives referred to in paragraph (b) of paragraph 1; and
  - (iii) any written representations or objections from Authorised Electricity Operators liable to be materially affected thereby (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.
- 2.4 National Grid, in accordance with its obligations under its Transmission Licence, consulted Authorised Electricity Operators through email distribution and by placing the Consultation Paper C/10 document on the National Grid website<sup>1</sup>. The Industry Consultation contained the proposed changes to the Grid Code, which can be found in Annex 1 of this Report to the Authority. A copy of the C/10 Industry Consultation can be found in Annex 2.
- 2.5 Comments were invited from all such Authorised Electricity Operators by 18<sup>th</sup> July 2011. National Grid received three responses from Authorised Electricity Operators. A copy of these responses, including National Grid's replies to those that responded, can be found in Annex 3.

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<sup>1</sup> <http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/>

### 3 Description of proposed Modification and its effects

#### Background

- 3.1 National Grid Electricity Transmission plc (NGET), in its role as National Electricity Transmission System Operator (NETSO), is required to co-ordinate and direct the flow of electricity onto and over the National Electricity Transmission System (NETS) in an efficient, economic and co-ordinated manner. This is achieved through the use of balancing services, which include ancillary services, offers and bids made in the Balancing Mechanism (BM) and other services, such as energy trades.
- 3.2 The principal means in which NGET access balancing services is via Electronic Despatch Logging (EDL). EDL is the means by which instructions are issued by NGET and certain data is submitted by Generators. Within the Grid Code, EDL is known as an 'automatic logging device' and Control Telephony is used as a backup in the event of a failure of EDL.
- 3.3 NGET take responsibility for (and fund) the communication paths for EDL and Control Telephony (to the extent that it is GB based), providing the necessary communication links and connection equipment at the User's Control Point. The User provides and installs the EDL terminal at their Control Point, which consists of a computer, suitable EDL client software and the necessary testing.
- 3.4 The Grid Code Connection Conditions (CCs) currently draw a link between the installation of an automatic logging device and a User's choice to participate in the BM (CC.6.5.8). NGET are concerned that this linkage, between the installation of an automatic logging device and participation in the Balancing Mechanism, precludes a co-ordinated approach being taken regarding access to plant for the provision of balancing services.
- 3.5 A User is able to provide balancing services regardless of whether they participate in the Balancing Mechanism but there is no clear requirement to install an automatic logging device unless a User is participating in the Balancing Mechanism. This results in areas of the Grid Code being at odds with each other. The Balancing Codes (BCs) refer to ancillary service instructions being given by automatic logging device (BC2.6.1) but if the User does not participate in the BM there is no clear requirement within the Grid Code for an automatic logging device to be installed.
- 3.6 NGET are concerned that an increasing volume of wind generation is connecting to the network, but choosing not to participate in the BM. This presents the risk that, going forward, a significant percentage of the plant mix will be unable to efficiently provide balancing services through their own choice not to install an automatic logging device, even where market conditions change such that it becomes more attractive to provide such services.
- 3.7 To maintain the ability to co-ordinate and direct the flow of electricity onto and over the National Electricity Transmission System in an efficient, economic and co-ordinated manner, NGET wish to ensure continued access to balancing services from the widest possible range of generation.
- 3.8 C/10, presented to the GCRP in May 2010, proposes to address this discrepancy within the Grid Code regarding the requirement to install an automatic logging device. The changes to the Grid Code are designed to allow NGET to maintain the technical ability to access sufficient balancing services in the required timescales to allow them to carry out their duties in accordance with the requirements of their transmission licence.

3.9 It should be clarified that C/10 is not going to change the obligation on users to participate in the BM, it is up to users if they wish to participate.

## Proposed Grid Code Changes

3.10 C/10 proposes to amend the Grid Code to clarify the requirement to install an automatic logging device. Currently, a generator is required to have an automatic logging device installed if they wish to participate in the Balancing Mechanism. The proposed changes will leave this requirement in place and in addition clarify that if a generator has a requirement to provide both Part 1 System Ancillary Services as identified in CC.8.1, namely Frequency Response and Reactive Power<sup>2</sup>, then they would be required to install an automatic logging device. National Grid may waive or delay the requirement to install an automatic logging device, based on this criterion, should it not be deemed efficient.

3.11 It is proposed to amend the following sections of the Grid Code:

- CC.6.5.8 (b) *Electronic Data Communication Facilities*;
- BC2.6.1 (a) *Normal Communication with Control Points*; and
- BC2.A.2.3 *Appendix 2 - Type and Form of Ancillary Service Instructions*.

3.12 The proposed changes are detailed in Annex 1.

## Working Group Discussions

3.13 The discussions of the Working Group can be found in Annex 2 as part of the Industry Consultation.

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<sup>2</sup> CC.8.1 requires all large generators to provide Reactive Power, however the CUSC only obliges National Grid to offer a Mandatory Services Agreement to generators that have a reactive capability of 15MVAR or more. Generators that have a reactive capability of less than 15MVAR can enter into a MSA with National Grid if they wish.

## 4 Impact & Assessment

### 4.1 Impact on National Electricity Transmission System (NETS)

The proposed changes will improve our ability to co-ordinate and direct the flow of electricity onto, and over, the NETS. No detrimental impacts on the NETS have been identified.

### 4.2 Impact on Grid Code Users

The proposed changes will have an impact on Generators, with a completion date on or after 1<sup>st</sup> January 2013, that are required to provide both Part 1 System Ancillary Services (Frequency Response and Reactive Power).

### 4.3 Impact on Greenhouse Gas emissions

There has been no material impact on Greenhouse Gas emission identified as a result of the proposed amendment.

### 4.4 Assessment against Grid Code Objectives

National Grid considers that C/10 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;

The proposed changes will improve our ability to co-ordinate and direct the flow of electricity onto, and over, the National Electricity Transmission System in an efficient, economic and co-ordinated manner, by ensuring continued access to balancing services from the widest possible range of generation

- (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

Enabling the appropriate communications across the widest possible range of generation could improve the facilitation of competition in balancing services

- (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 by enabling the widest possible range of generation to provide balancing services

### 4.5 Impact on Industry Documents

#### 4.5.1 Impact on core industry documents

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

#### 4.5.2 Impact on other industry documents

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

## 5 Recommendations

- 5.1 It is proposed to amend the *Connection Conditions* and *Balancing Code No 2* of the Grid Code to incorporate the requirement to have an automatic logging device installed if a generator is required to provide both Part 1 System Ancillary Services as identified in CC.8.1, namely Frequency Response and Reactive Power.
- 5.2 The clauses that require amendment to bring this requirement into effect are:
- CC.6.5.8 (b) *Electronic Data Communication Facilities*;
  - BC2.6.1 (a) *Normal Communication with Control Points*; and
  - BC2.A.2.3 *Appendix 2 - Type and Form of Ancillary Service Instructions*.

## 6 Industry Consultation Responses

- 6.1 National Grid has consulted Authorised Electricity Operators (AEOs) on this issue. The consultation period opened on 20<sup>th</sup> June 2011 and closed on 18<sup>th</sup> July 2011. Two responses were received during the consultation period and a third was accepted as a late response.
- 6.2 The below table provides an overview of the three responses received. Copies of the responses, along with the NGET replies, are included in Annex 3.

Reference	Company	Supportive	Comments
C/10-CR-01	EDF Energy	Yes	<ul style="list-style-type: none"> <li>Supportive of the Working Group recommendations</li> <li>Believes the flexibility in the solution should allow efficient application of the requirement to install EDL where there is a demonstrable benefit to management of the system.</li> <li>Agrees that the delay before implementation seems appropriate to allow minimal impact on individual project delivery timescales.</li> </ul>
C/10-CR-02	RWE	Yes	<ul style="list-style-type: none"> <li>Supportive of proposed change and agrees that it will help clarify the circumstances under which EDL would be required</li> </ul>
C/10-CR-03	SSE	Yes	<ul style="list-style-type: none"> <li>Agrees with the view of the Working Group and National Grid</li> <li>Believes that the solution is a pragmatic approach that would better facilitate the Grid Code objectives</li> </ul>

- 6.3 NGET welcomes the supportive comments received by the respondents and acknowledges that there were no issues identified by any of the respondents that required addressing.

## Annex 1 - Proposed Legal Text

Changes are required to the following sections of the Grid Code;

CC.6.5.8 (b)

BC2.6.1 (a)

BC2.A.2.3

### CC.6.5.8 Electronic Data Communication Facilities

(a) All **BM Participants** must ensure that appropriate electronic data communication facilities are in place to permit the submission of data, as required by the **Grid Code**, to **NGET**.

(b) In addition,

1. any **User** that wishes to participate in the **Balancing Mechanism**;  
or
2. any **BM Participant** in respect of its **BM Units** at a **Power Station** where the **Construction Agreement** and/or a **Bilateral Agreement** has a **Completion Date** on or after 1 January 2013 and the **BM Participant** is required to provide all **Part 1 System Ancillary Services** in accordance with CC.8.1 (unless **NGET** has otherwise agreed)

must ensure that appropriate automatic logging devices are installed at the **Control Points** of its **BM Units** to submit data to and to receive instructions from **NGET**, as required by the **Grid Code**. For the avoidance of doubt, in the case of an **Interconnector User** the **Control Point** will be at the **Control Centre** of the appropriate **Externally Interconnected System Operator**.

(c) Detailed specifications of these required electronic facilities will be provided by **NGET** on request and they are listed as **Electrical Standards** in the Annex to the **General Conditions**.

### BC2.6.1 Normal Communication with Control Points

(a) With the exception of BC2.6.1(c) below, **Bid-Offer Acceptances** and, **unless otherwise agreed with NGET, Ancillary Service** instructions shall be given by automatic logging device and will be given to the **Control Point** for the **BM Unit**. For all **Planned Maintenance Outages** the provisions of BC2.6.5 will apply. For **Generating Units** communications under **BC2** shall be by telephone unless otherwise agreed by **NGET** and the **User**.

(b) **Bid-Offer Acceptances** and **Ancillary Service** instructions must be formally acknowledged immediately by the **BM Participant** (or the relevant person on its behalf) via the **Control Point** for the **BM Unit** or **Generating Unit** in respect of that **BM Unit** or that **Generating Unit**. The acknowledgement and subsequent confirmation or rejection, within two minutes of receipt, is normally given electronically by automatic logging device. If no confirmation or rejection is received by **NGET** within two minutes of the issue of the **Bid-Offer Acceptance**, then **NGET** will contact the **Control Point** for the **BM Unit** by telephone to determine the reason for the lack of confirmation or rejection. Any rejection must be given in accordance with BC2.7.3 or BC2.8.3.

(c) In the event of a failure of the logging device or a **NGET** computer system outage, **Bid-Offer Acceptances** and instructions will be given, acknowledged, and confirmed or rejected by telephone. The provisions of BC2.9.7 are also applicable.

(d) In the event that in carrying out the **Bid-Offer Acceptances** or providing the **Ancillary Services**, or when operating at the level of the **Final Physical Notification Data** as provided in BC2.5.1, an unforeseen problem arises, caused on safety grounds (relating to personnel or plant), **NGET** must be notified without delay by telephone.

(e) The provisions of BC2.5.3 are also relevant.

(f) Submissions of revised Mvar capability may be made by facsimile transmission, using the format given in Appendix 3 to **BC2**.

(g) Communication will normally be by telephone for any purpose other than **Bid-Offer Acceptances**, in relation to **Ancillary Services** or for revisions of Mvar Data.

(h) Submissions of revised availability of **Frequency Sensitive Mode** may be made by facsimile transmission, using the format given in Appendix 4 to **BC2**. This process should only be used for technical restrictions to the availability of **Frequency Sensitive Mode**.

### BC2.A.2.3

As described in BC2.6.1, **unless otherwise agreed with NGET, Ancillary Service** instructions are normally given by automatic logging device, but in the absence of, or in the event of failure of the logging device, instructions will be given by telephone.

An electronic copy of the Industry Consultation can be found at:

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

Stage 02: Industry Consultation

Grid Code

# C/10 Grid Code Requirement for Electronic Communication Facilities between NGET and BM Participants

What stage is this document at?

- 01 Working Group Report
- 02 **Industry Consultation**
- 03 Report to the Authority

This proposal seeks to modify the Grid Code to clarify the requirements to install an automatic logging device.

This document is open for Industry Consultation. Any interested party is able to make a response in line with the guidance set out in Section 6 of this document. This document also contains the findings of the Working Group which formed in May 2010 and concluded in April 2011.

**Published on:** 20 June 2011  
**Responses by:** 18 July 2011



**The Working Group recommends:**

That changes are made to the Grid Code to clarify the requirement to install an automatic logging device



**High Impact:**

National Grid Electricity Transmission



**Medium Impact:**

Large Generators



**Low Impact:**

None identified

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## About this document

This Industry Consultation outlines the information required for interested parties to form an understanding of a defect within the Grid Code and the proposed solutions.

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.

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If the GCRP feels that the issue has 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 Authority on how to address the defect within the Grid Code. The Authority then considers the issue and the proposed solutions to make a determination.



### Any Questions?

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## 1 Executive Summary

- 1.1 C/10 was raised at the May 2010 GCRP to address a defect within the Grid Code regarding the requirement to install an automatic logging device.
- 1.2 The principal means in which National Grid Electricity Transmission (NGET), as System Operator, access balancing services is via Electronic Despatch Logging (EDL). EDL is the means by which instructions are issued by NGET and certain data is submitted by Generators. Within the Grid Code, EDL is known as an 'automatic logging device' and Control Telephony is used as a backup in the event of a failure of EDL.
- 1.3 Currently the requirement to install an automatic logging device is linked to a User's participation in the Balancing Mechanism. There is no clear requirement to have an automatic logging device installed for the despatch of balancing services which results in an inefficient approach of despatch by telephone.
- 1.4 The Working Group has reviewed the requirements under the Grid Code and proposes that a User will be required to have an automatic logging device installed if:
  - they wish to actively participate in the Balancing Mechanism; or
  - they are required to provide both Part 1 System Ancillary Services, namely Frequency Response and Reactive Power.
- 1.5 National Grid may waive or delay the requirement to install an automatic logging device should it be deemed inefficient. This does not apply to participation in the Balancing Mechanism.
- 1.6 At the May 2011 GCRP it was agreed to send C/10 out to industry consultation for a period of 20 working days.

## 2 Background

- 2.1 National Grid Electricity Transmission plc (NGET), in its role as National Electricity Transmission System Operator (NETSO), is required to co-ordinate and direct the flow of electricity onto and over the National Electricity Transmission System (NETS) in an efficient, economic and co-ordinated manner. This is achieved through the use of balancing services, which include ancillary services, offers and bids made in the Balancing Mechanism (BM) and other services, such as energy trades
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- 2.4 The Grid Code Connection Conditions (CCs) currently draw a link between the installation of an automatic logging device and a User's choice to participate in the BM (CC.6.5.8). NGET are concerned that this linkage, between the installation of an automatic logging device and participation in the Balancing Mechanism, precludes a co-ordinated approach being taken regarding access to plant for the provision of balancing services.
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- 2.6 NGET are concerned that an increasing volume of wind generation is connecting to the network, but choosing not to participate in the BM. This presents the risk that, going forward, a significant percentage of the plant mix will be unable to efficiently provide balancing services through their own choice not to install an automatic logging device, even where market conditions change such that it becomes more attractive to provide such services.
- 2.7 To maintain the ability to co-ordinate and direct the flow of electricity onto and over the National Electricity Transmission System in an efficient, economic and co-ordinated manner, NGET wish to ensure continued access to balancing services from the widest possible range of generation.
- 2.8 C/10, presented to the GCRP in May 2010, proposes to address this discrepancy within the Grid Code regarding the requirement to install an automatic logging device. The changes to the Grid Code are designed to allow NGET to maintain the technical ability to access sufficient balancing services in the required timescales to allow them to carry out their duties in accordance with the requirements of their transmission licence.
- 2.9 It should be clarified that C/10 is not going to change the obligation on users to participate in the BM, it is up to users if they wish to participate.

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### 3 Purpose & Scope of the Working Group

- 3.1 The original paper presented to May 2010 GCRP (see Annex 2) proposed to take the issue to Industry Consultation but following discussion within the GCRP it was determined that the issue should progress to a Working Group for further development.
- 3.2 At the first Working Group meeting on 20<sup>th</sup> August 2010, the Working Group members reviewed the Terms of Reference (see Annex 3) and agreed the following issues to be the focus of the Working Group:
- (a) The circumstances under which an obligation to install an automatic logging device should apply to BM Participants of the National Electricity Transmission System;
  - (b) Development of cost effective solution and clarification of the Grid Code text relating to the use of an automatic logging device for issuing Bid-Offer Acceptances and Ancillary Service Instructions; and
  - (c) Recommendations regarding topics for further consideration that, whilst beyond the scope of the Grid Code, might require changes to other industry codes.
- 3.3 The Working Group also agreed that the outcomes would be:
- (a) a GCRP paper recommending a way forward on the above issues, taking into account the group discussions
  - (b) draft legal text of the proposed Grid Code changes as appropriate
- 3.4 The original timescales of the group suggested that a paper would be delivered to the November 2010 GCRP. The timetable was later revised for a paper to be submitted to the May 2011 GCRP.

## 4 Working Group Discussions

- 4.1 The Working Group convened two meetings to discuss the issues presented in C/10. The first meeting was held on 20<sup>th</sup> August 2010 with the second on 29<sup>th</sup> March 2011.
- 4.2 At the first Working Group meeting, National Grid explained that under the current drafting in the Grid Code there is no clear requirement for a user to install an automatic logging device if they do not wish to participate in the Balancing Mechanism (BM). This contradicts the Balancing Codes, specifically BC2.6.1(a), which states that all ancillary service instructions shall be given by automatic logging device. The mandatory ancillary services are Frequency Response and Reactive Power, and National Grid requires Electronic Despatch Logging (EDL) for both of these services. It was also clarified that this amendment is not going to change the obligation on users to participate in the BM, it is up to users if they wish to participate. The group acknowledged the current defect in regards to installing an automatic logging device to provide ancillary services.
- 4.3 Working Group members wanted to know how these instructions are currently relayed to generators and National Grid explained that in the absence of an automatic logging device the telephone would be used, however, this is not ideal especially looking towards the future within increasing volumes of variability and inflexibility associated with new renewable, nuclear and gas fired generation.
- 4.4 Concerns were raised that moving to an EDL system would remove the flexibility that a phone provides as EDL has to be to a fixed point. This is especially concerning when some stations are unmanned. It was explained that EDL goes to a Control Point which, under CC.7.9, currently has the requirement to be manned 24 hours a day.
- 4.5 The group sought clarification of the difference between Electronic Despatch Logging (EDL) and Electronic Data Transfer (EDT), and how emergency instructions are given. EDL is a two way communication channel that allows for the instruction of generators whereas EDT is a one way communication channel that generators use to submit information, such as Physical Notification data, to National Grid. Emergency communications will continue to be given by telephone.
- 4.6 It was noted that the original paper presented to the May 2010 GCRP stated a single Control Point that was managing a combined Registered Capacity that equals or exceeds 100 MW would require an automatic logging device. National Grid explained this value was based on a cost benefit estimate. The group raised concerns that this arbitrary limit could create a situation in which multiple Control Points would be created by a User to avoid ever breaching the 100MW limit and being obligated to install an automatic logging device.
- 4.7 The Working Group thought that it would be sensible to have clearer guidelines regarding the circumstances in which an automatic logging device must be installed. Rather than an arbitrary limit at the Control Point it was suggested that the stations connected to the Control Point should be looked at.
- 4.8 In the first Working Group meeting the members determined that if a generator is considered 'Large' in their respective areas (NGET 100MW, SPT 30MW, SHETL 10MW) and has a requirement to provide a mandatory ancillary service they would be required to install an automatic logging device.

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4.9 Through further discussion it became clear that this requirement could result in inefficient installation of EDL by capturing some generators that would likely never be instructed to provide ancillary services. The Working Group determined that if a generator has a requirement to provide both Part 1 System Ancillary Services as identified in CC.8.1, namely Frequency Response and Reactive Power<sup>1</sup>, then they would be required to install an automatic logging device. National Grid may waive or delay the requirement to install an automatic logging device, based on this criterion, should it not be deemed efficient.

4.10 Based on the above criterion, National Grid was asked to conduct analysis to determine:

- ***How many generators would be impacted by the proposed criterion?***

The analysis carried out by National Grid indicates that if we require EDL for all generators that are required to provide both Part 1 System Ancillary Services it is estimated that we may need to install EDL to 18 Control Points for generators connecting between the suggested implementation date of 1<sup>st</sup> January 2013 and 2019. These 18 Control Points would be controlling 13GW of plant.

- ***What would the cost be to implement to criterion?***

For National Grid, the current costs associated with installing EDL and Control Telephony are approximately £30,000 - £40,000 to deliver per site and on going cost, which includes rental and support costs, is approximately £7,000 per site. There are efficiencies in installing EDL together with Control Telephony which is why the total cost is quoted here. For generators the initial costs, which include server, software and licence implementation, are approximately £30,000. There are on going product and support costs but these will vary depending on the circumstances (e.g. in house technical experience, level of support required).

National Grid covers the cost of EDL to the Control Point as long as it is in Great Britain. EDL to Control Points that are located outside of Great Britain is charged at a one off cost for installation. The control telephony can be combined with EDL for efficiency reasons; however EDT and EDL will always be separate.

4.11 The above analysis has only looked at Scotland to get an idea of the scale of the impact. It is estimated that 18 Control Points are going to require EDL installation as a result of the proposed changes to the Grid Code. However, this number could decrease as projects may not materialise and there could be some degree of consolidation of Control Points.

4.12 If a generator is required to provide both Part 1 System Ancillary Services, the following issues may be considered by National Grid when evaluating

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<sup>1</sup> CC.8.1 requires all large generators to provide Reactive Power, however the CUSC only obliges National Grid to offer a Mandatory Services Agreement to generators that have a reactive capability of 15MVAR or more.

Generators that have a reactive capability of less than 15MVAR can enter into a MSA with National Grid if they wish.

the efficiency of installing EDL to the Control Point and whether installation should be waived or delayed:

- Obligation to provide reactive power (generators that provide less than 15MVARs are not currently obliged to enter into a Mandatory Services Agreement with National Grid to provide Reactive Power);
- If the generator is embedded
- Restrictions on embedded generators reactive range required by the DNO.
- Size and location of the generator

4.13 Ancillary services for offshore generators were briefly discussed and it was noted that other groups are considering these elements. There is not any expectation that offshore would be treated differently to onshore in regards requirements to install an automatic logging device.

4.14 The issue of retrospectivity was discussed and it was determined that any changes would not be retrospectively applied.

4.15 The Working Group discussed the implementation strategy regarding any changes. It was noted that a station currently being built could be adversely impacted if new rules were enforced mid-construction. The group thought that putting a requirement on a Control Point should not adversely impact a new build although it may be prudent to attach an implementation timeline around commissioning or define an 'effective from' date.

4.16 The group discussed an implementation date and suggested that the new requirements would apply to those User's which have a completion date after 1<sup>st</sup> January 2013. It was felt that this would allow adequate time for the installation of EDL between requirements placed into the Grid Code and the completion of projects in 2013. The Working Group suggested there should be a question within the Industry Consultation that seeks views on an implementation date.

4.17 To reach the date of 1 January 2013, the Working Group was assuming changes to the Grid Code would occur in September/October 2011. This is of course dependent on an Authority decision and may need to be revised based on actual implementation date of the changes.

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## 5 Working Group Recommendations

- 5.1 The Working Group has recognised the defect within the Grid Code surrounding the requirements to install an automatic logging device.
- 5.2 The Working Group recommends:
- (a) If a generator has a requirement to provide both Part 1 System Ancillary Services as identified in CC.8.1, namely Frequency Response and Reactive Power, then they will be required to install an automatic logging device. National Grid may waive or delay the requirement to install an automatic logging device, based on this criterion, should it not be deemed efficient.
  - (b) That the proposed Grid Code drafting (see Annex 1) be implemented to clarify the requirements to have an automatic logging device installed.

## 6 Responses

6.1 Views are invited upon the proposals outlined in this report, which should be received by 18 July 2011.

6.2 Your formal responses may be sent to:

[grid.code@uk.ngrid.com](mailto:grid.code@uk.ngrid.com)

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Authority

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## Annex 1 - Proposed Legal Text

Changes are required to the following sections of the Grid Code;

CC.6.5.8 (b)  
BC2.6.1 (a)  
BC2.A.2.3

### CC.6.5.8 Electronic Data Communication Facilities

(a) All **BM Participants** must ensure that appropriate electronic data communication facilities are in place to permit the submission of data, as required by the **Grid Code**, to **NGET**.

(b) In addition,

1. any **User** that wishes to participate in the **Balancing Mechanism**;  
or
2. any **BM Participant** in respect of its **BM Units** at a **Power Station** where the **Construction Agreement** and/or a **Bilateral Agreement** has a **Completion Date** on or after 1 January 2013 and the **BM Participant** is required to provide all **Part 1 System Ancillary Services** in accordance with CC.8.1 (unless **NGET** has otherwise agreed)

must ensure that appropriate automatic logging devices are installed at the **Control Points** of its **BM Units** to submit data to and to receive instructions from **NGET**, as required by the **Grid Code**. For the avoidance of doubt, in the case of an **Interconnector User** the **Control Point** will be at the **Control Centre** of the appropriate **Externally Interconnected System Operator**.

(c) Detailed specifications of these required electronic facilities will be provided by **NGET** on request and they are listed as **Electrical Standards** in the Annex to the **General Conditions**.

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BC2.6.1 Normal Communication with Control Points

(a) With the exception of BC2.6.1(c) below, **Bid-Offer Acceptances** and, unless otherwise agreed with **NGET**, **Ancillary Service** instructions shall be given by automatic logging device and will be given to the **Control Point** for the **BM Unit**. For all **Planned Maintenance Outages** the provisions of BC2.6.5 will apply. For **Generating Units** communications under **BC2** shall be by telephone unless otherwise agreed by **NGET** and the **User**.

(b) **Bid-Offer Acceptances** and **Ancillary Service** instructions must be formally acknowledged immediately by the **BM Participant** (or the relevant person on its behalf) via the **Control Point** for the **BM Unit** or **Generating Unit** in respect of that **BM Unit** or that **Generating Unit**. The acknowledgement and subsequent confirmation or rejection, within two minutes of receipt, is normally given electronically by automatic logging device. If no confirmation or rejection is received by **NGET** within two minutes of the issue of the **Bid-Offer Acceptance**, then **NGET** will contact the **Control Point** for the **BM Unit** by telephone to determine the reason for the lack of confirmation or rejection. Any rejection must be given in accordance with BC2.7.3 or BC2.8.3.

(c) In the event of a failure of the logging device or a **NGET** computer system outage, **Bid-Offer Acceptances** and instructions will be given, acknowledged, and confirmed or rejected by telephone. The provisions of BC2.9.7 are also applicable.

(d) In the event that in carrying out the **Bid-Offer Acceptances** or providing the **Ancillary Services**, or when operating at the level of the **Final Physical Notification Data** as provided in BC2.5.1, an unforeseen problem arises, caused on safety grounds (relating to personnel or plant), **NGET** must be notified without delay by telephone.

(e) The provisions of BC2.5.3 are also relevant.

(f) Submissions of revised Mvar capability may be made by facsimile transmission, using the format given in Appendix 3 to **BC2**.

(g) Communication will normally be by telephone for any purpose other than **Bid-Offer Acceptances**, in relation to **Ancillary Services** or for revisions of Mvar Data.

(h) Submissions of revised availability of **Frequency Sensitive Mode** may be made by facsimile transmission, using the format given in Appendix 4 to **BC2**. This process should only be used for technical restrictions to the availability of **Frequency Sensitive Mode**.

BC2.A.2.3

As described in BC2.6.1, unless otherwise agreed with **NGET**, **Ancillary Service** instructions are normally given by automatic logging device, but in the absence of, or in the event of failure of the logging device, instructions will be given by telephone.

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**Grid Code Review Panel**

**Grid Code Requirement for Electronic Communication Facilities between NGET  
and BM Participants  
Issue 1**

**Summary**

1. This paper proposes changes to the Grid Code to ensure NGET has continued ability to instruct load changes and ancillary services in the Balancing Mechanism (BM) in an efficient and co-ordinated manner.
2. The proposed changes relate to:
  - the process by which the requirement to install an automatic logging device is determined; and
  - the means by which ancillary services instructions are issued.

**Introduction**

3. As National Electricity Transmission System Operator (NETSO), National Grid Electricity Transmission plc (NGET) is required to co-ordinate and direct the flow of electricity onto and over the National Electricity Transmission System in an efficient, economic and co-ordinated manner. This is achieved through the use of balancing services, which include ancillary services, offers and bids made in the Balancing Mechanism (BM) and other services, such as energy trades.
4. Looking to the future, the UK faces an unprecedented change in the generation fleet due to the closure of older fossil fuel and nuclear power stations and the expected connection of significant volumes of new renewable, nuclear and gas-fired generation. Many of these older fossil fuel power stations provide us with significant volumes of balancing services, whilst the expected new generation will bring with it the need to manage increasing levels of variability and inflexibility.
5. Our principal means of accessing balancing services is via Electronic Despatch Logging (EDL). EDL is the means by which instructions are issued by NGET and certain data submitted by Generators. It is known in the Grid Code as an 'automatic logging device'. Control Telephony is used as a backup in the event of failure of EDL.
6. We take responsibility for (and fund) the communication paths for EDL and Control Telephony (to the extent that it is GB based<sup>1</sup>), providing the necessary communication links and connection equipment at the User's Control Point. The User provides and installs the EDL terminal and client software at their control point.
7. The Grid Code Connection Conditions (CCs) currently place the decision whether to install an automatic logging device at the discretion of the User, stating that an automatic logging device is required to be installed if the User wishes to

<sup>1</sup> For overseas control points, the User currently pays for the excess installation costs (for both EDL and Control Telephony) over and above those that would be incurred if the Control Point were based in Great Britain via a one-off charge in accordance with clause 2.14.4 of the CUSC.

participate in the BM, so that we may electronically issue instructions to the User; and the User may submit revised Export and Import Limits (BC1.4.2(c)) and current Operational Day Dynamic Data (BC2.5.3.1).

8. However, the Balancing Codes (BCs) refer to the automatic logging device as being required for the instruction of mandatory ancillary services, which is at odds with the discretion provided for in the CCs.
9. To maintain our ability to co-ordinate and direct the flow of electricity onto and over the National Electricity Transmission System in an efficient, economic and co-ordinated manner, we wish to ensure continued access to balancing services from the widest possible range of generation.
10. This paper proposes changes to the Grid Code that are designed to allow us to maintain the technical ability to access sufficient balancing services in the required timescales to allow us to carry out our duties in accordance with the requirements of our transmission licence.

#### Summary of Current Grid Code Requirements

11. The Grid Code contains a definition for 'BM Participant', as follows: *"A person who is responsible for and controls one or more BM Units or where a Bilateral Agreement specifies that a User is required to be treated as a BM Participant for the purposes of the Grid Code. For the avoidance of doubt, it does not imply that they must be active in the Balancing Mechanism."*
12. The Grid Code (CC 6.5.8) places the following requirements on BM Participants in respect of electronic data communication facilities:
  - a) *All BM Participants must ensure that appropriate electronic data communication facilities<sup>2</sup> are in place to permit the submission of data, as required by the Grid Code, to NGET.*
  - b) *In addition, any User that wishes to participate in the Balancing Mechanism must ensure that appropriate automatic logging devices are installed at the Control Points of its BM Units to submit data to and to receive instructions from NGET, as required by the Grid Code...*
13. If a User chooses not to participate in the BM, there is no clear requirement under the Connection Conditions to install an automatic logging device.
14. However, the Grid Code requires the provision of mandatory ancillary services from certain generators. BC2.6.1(a) states that, with the exception of BC2.6.1(c), *'...Ancillary Service instructions shall be given by automatic logging device...'*. BC2.6.1(c) allows instructions to be given by telephone, but only in the event of a failure of the automatic logging device.
15. The Grid Code therefore currently gives conflicting messages regarding the need to install an automatic logging device.

#### The Issue

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<sup>2</sup> Currently, Electronic Data Transfer (EDT) is the means by which data are submitted to NGET by generators.

16. The Grid Code CCs currently draw a link between the installation of an automatic logging device and a User's choice whether or not to participate in the BM. We are concerned that this linkage precludes a co-ordinated approach being taken regarding access to plant for the provision of balancing services. In particular, we are concerned that an increasing volume of wind generation is connecting to the network, but choosing not to participate in the BM. The Grid Code does not currently require the installation of an automatic logging device in such circumstances.
17. In our recent consultation document<sup>3</sup> "Operating the Electricity Transmission Networks in 2020" we asked whether we were correct in assuming that wind generation is controllable enough to assist in operating the networks.
18. Most respondents stated that wind generation was likely to be controllable but that they did not see clear economic drivers to encourage this. However flexible operation will inevitably be required from wind farm operators at some point in the future, increasingly so as installed capacity grows. Ultimately, wholesale and imbalance prices should encourage flexible operation particularly where high wind generation output coincides with low demand periods.
19. Current Grid Code provisions present the risk that, going forward, a significant percentage of the plant mix will be unable to efficiently provide balancing services through their own choice not to install an automatic logging device, even where market conditions change such that it becomes more attractive to provide such services.

#### **Proposed Solution**

20. To avoid the future scenario described in paragraph 19 we propose to remove the linkage between a User's desire to participate in the BM and the installation of an automatic logging device and instead set out in the Grid Code the conditions under which an automatic logging device would be required.
21. The Grid Code (CC6.5.8(a)) states that "All BM Participants must ensure that appropriate electronic data communication facilities are in place to permit the submission of data, as required by the Grid Code, to NGET." We propose to replicate this approach in CC6.5.8(b) to mandate the requirement to install an automatic logging device.
22. To achieve an appropriate balance between (a) the ability to efficiently instruct load changes and ancillary services and (b) the cost of providing such efficiency via the installation of an automatic logging device, we propose the mandatory requirement to install an automatic logging device between NGET and Control Points where the combined Registered Capacity managed from a single Control Point equals or exceeds 100 MW.
23. For providers of mandatory ancillary services from power stations of less than 100 MW capacity, we propose to determine the requirement (and periodically review this requirement) to install an automatic logging device on a case-by-case basis following discussions with the connectee.

<sup>3</sup> <http://www.nationalgrid.com/NR/rdonlyres/32879A26-D6F2-4D82-9441-40FB2B0E2E0C/39517/Operatingin2020Consultation1.pdf>

24. For the avoidance of doubt, the proposal will not imply in any way that there is any obligation for plant to actively participate in the BM.

25. The proposed changes to the Grid Code text are contained in the annex to this paper.

#### **Implementation**

26. We propose that the changes outlined in this paper will be forward looking and take effect from a fixed point in time (to be agreed).

#### **Responsibilities**

27. The installation of EDT is the responsibility of the User. They are responsible for purchasing and developing the information systems used to produce the EDT submissions and for providing the communications link(s) from their Trading Point to NGET. The User is able to choose the trade-off between the quality and resilience of their EDT information systems and communications against the risk of not being able to submit Physical Notification and Bid-Offer Data to NGET.

28. Generally, the EDL communication link is between NGET and a Control Point at a power station, although it can be the case that a number of smaller stations are aggregated together at a common Control Point, which would reduce the number of EDL routes required. EDL does, however, require a separate communications service to EDT.

29. Due to the benefit we see from the installation of EDL, we take responsibility for its communication path, providing the necessary communication links and connection equipment at the User's Control Point (subject to the provisions set out in footnote 1). The User provides and installs the EDL terminal at their control point, the cost of which is relatively small and includes the cost of a PC, suitable EDL client software and the necessary testing.

#### **Impact of BM Replacement Project**

30. Our current BM systems, which enable us to manage real-time electricity supply and demand as well as interfacing with market participant systems and the Balancing Mechanism Reporting Service (BMRS), are nearing the end of their design life, and we have initiated a project to replace them.

31. The replacement systems will feature the continued availability of the existing EDT and EDL interfaces. Whilst, post go-live, replacements for EDT, EDL and other electronic communications will be offered to market participants (which will use modern technology and international technical standards where possible), the principles proposed within this paper are independent of the actual technology used to implement the electronic communications facilities.

#### **Way Forward**

32. GCRP members are invited:

- To consider the issue described in this paper;
- To agree that National Grid should proceed to a one month industry wide consultation on the proposed changes.

## ANNEX: Proposed Changes to Grid Code Text

This annex contains the suggested changes to the Grid Code text that will give effect to the proposal contained within this paper.

### Connection Conditions

Electronic Data Communication Facilities

CC.6.5.8

(a) All **BM Participants** must ensure that appropriate electronic data communication facilities are in place to permit the submission of data, as required by the **Grid Code**, to **NGET**.

(b) In addition,

1. any **User** that wishes to participate in the **Balancing Mechanism**;  
and
2. [from (insert date here)], all **BM Participants** in respect of a **Control Point** where the aggregate **Registered Capacity** of all **Power Stations** controlled from that **Control Point** is 100 MW or more;

must ensure that appropriate automatic logging devices are installed at the **Control Points** of its **BM Units** to submit data to and to receive instructions from **NGET**, as required by the **Grid Code**. For the avoidance of doubt, in the case of an **Interconnector User** the **Control Point** will be at the **Control Centre** of the appropriate **Externally Interconnected System Operator**.

(c) Detailed specifications of these required electronic facilities will be provided by **NGET** on request and they are listed as **Electrical Standards** in the Annex to the **General Conditions**.

### Balancing Code 1

1.4.2 (d) **Bid-Offer Data**

Each **BM Participant** may, in respect of each of its **BM Units**, but must not in respect of its **Generating Units** submit to **NGET** for any **Settlement Period** of the next following **Operational Day** the data listed in **BC1 Appendix 1** under the heading of "**Bid-Offer Data**" to amend the data already held by **NGET** in relation to **Bid-Offer Data**, which would otherwise apply to those **Settlement Periods**. The submitted **Bid-Offer Data** will be utilised by **NGET** in the preparation and analysis of its operational plans for the next following **Operational Day**. Unless otherwise agreed with **NGET**, **Bid-Offer Data** may not be submitted unless an automatic logging device has been installed at the **Control Point** for the **BM Unit** in accordance with **CC.6.5.8(b)**.

### Balancing Code 2

2.6.1 Normal Communication with **Control Points**

(a) With the exception of **BC2.6.1(c)** below, unless otherwise agreed with **NGET**, **Bid-Offer Acceptances** and **Ancillary Service** instructions shall be given by automatic logging device and will be given to the **Control Point** for the **BM Unit**. For all **Planned Maintenance Outages** the provisions of **BC2.6.5** will apply. For **Generating Units** communications under **BC2** shall be by telephone unless otherwise agreed by **NGET** and the **User**.

**BC2.8.3** Rejection of **Ancillary Service** instructions

(a) **Ancillary Service** instructions may only be rejected, by automatic logging device or by telephone, on safety grounds (relating to personnel or plant) or because they are not

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consistent with the applicable **Export and Import Limits, QPNs, Dynamic Parameters, Joint BM Unit Data, Other Relevant Data** or data contained in the **Ancillary Services**

Appendix 1 – Form of **Bid-Offer Acceptances**

BC2.A.1.1 This Appendix describes the forms of **Bid-Offer Acceptances**. As described in BC2.6.1, **unless otherwise agreed with NGET, Bid-Offer Acceptances** are normally given by an automatic logging device, but in the event of failure of the logging device, **Bid-Offer Acceptances** will be given by telephone.

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

BC2.A.2.3 As described in BC2.6.1, **unless otherwise agreed with NGET, Ancillary Service** instructions are normally given by automatic logging device, but in the absence of, or in the event of failure of the logging device, instructions will be given by telephone.

**Grid Code Working Group  
Grid Code Requirement for Electronic Communication Facilities between NGET and BM  
Participants**

**Draft Terms of Reference – Issue 2**

**Objectives**

A paper (C/10) was presented to the May 2010 GCRP by NGET proposing changes to the Grid Code to clarify the requirement to install an automatic logging device at the User's Control Point. Currently, the Grid Code states that installation of an automatic logging device is at the discretion of the User if they wish to participate in the BM. This discretion precludes a co-ordinated approach being taken regarding efficient access to plant for the provision of balancing services. In addition, as the Balancing Codes refer to an automatic logging device being required to provide mandatory ancillary services – this is at odds with the discretion provided for in the Connection Conditions.

The GCRP recommended establishing a working group to discuss the issues in more detail.

The objective of the group is to discuss the applicability of the proposed changes and agree the required legal drafting.

**Membership**

The membership of the working group will include members of the GCRP or their nominated representatives, the National Electricity Transmission System Operator and Ofgem.

**Scope of Work**

The group will consider the following issues:

1. The circumstances under which an obligation to install an automatic logging device should apply to Users of the National Electricity Transmission;
2. Development of cost effective solution and clarification of the Grid Code text relating to the use of an automatic logging device for issuing Bid-Offer Acceptances and Ancillary Service Instructions; and
3. Recommendations regarding topics for further consideration that, whilst beyond the scope of the Grid Code, might require changes to other industry codes.

**Deliverables**

National Grid will produce:

- a GCRP paper recommending a way forward on the above issues, taking into account the group discussions which will be submitted to the May 2011 Grid Code Review Panel
- draft legal text of the proposed Grid Code changes as appropriate

## Annex 4 - Working Group Attendance

Name	Company	Role	Meeting 1 (20/08/10)	Meeting 2 (29/03/11)
Neil Rowley	National Grid	Chair	X	X
Thomas Derry <sup>2</sup>	National Grid	Technical Secretary/ Member	X	X
John Norbury	RWE	Member	X	Dial in
Campbell McDonald	SSE	Member	X	Dial in
John Morris	SSE	Member	X	Dial in
Ian Pashley <sup>3</sup>	National Grid	Member	X	
Ivan Kileff	National Grid	Member	X	X
Nicolas Klaissle <sup>4</sup>	Vattenfall	Member	X	

### **Meetings**

Blank - Did not attend

X - Attended

<sup>2</sup> Thomas Derry was Technical Secretary for meeting 1 and National Grid representative for meeting 2

<sup>3</sup> Ian Pashley left the working group after meeting 1

<sup>4</sup> Nicolas Klaissle left the working group after meeting 1

## Annex 3 - Consultation Responses

The following table provides a list of the responses received to the Grid Code Consultation, A/11.

Reference	Company
C/10-CR-01	EDF Energy
C/10-CR-02	RWE
C/10-CR-03	SSE

Reference	Company
C/10-CRR-01	NGET reply to EDF Energy
C/10-CRR-02	NGET reply to RWE
C/10-CRR-03	NGET reply to SSE

## C/10-CR-01 (EDF Energy)

### EDF Energy Response to C/10 Industry Consultation

EDF Energy welcomes the opportunity to comment on National Grid's consultation on Electronic Communication Facilities between NGET and BM Participants. We were represented on the working group we support the recommendations.

In the proposal a User will be required to have an automatic logging device installed at the Control Point if: they wish to actively participate in the Balancing Mechanism; or they are required to provide both Part 1 System Ancillary Services, namely Frequency Response and Reactive Power.

National Grid may waive or delay the requirement to install an automatic logging device should it be deemed inefficient. This does not apply to participation in the Balancing Mechanism. This flexibility should allow efficient application of the requirement only on generators where there is a demonstrable benefit to management of the system. The delay before implementation seems appropriate to allow this requirement to be incorporated by developers with minimal impact on individual project delivery timescales.

Should you wish to discuss any of the issues raised in our response or have any queries please contact me.

**John MORRIS**  
**Senior Transmission and Trading Advisor**  
EDF Energy Corporate Policy and Regulation  
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Gloucester GL4 3RS

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thomas.ireland@uk.ngrid.com

12<sup>th</sup> July 2011

Dear Tom

**RWE RESPONSE – C/10 GRID CODE REQUIREMENTS FOR ELECTRONIC COMMUNICATIONS FACILITIES BETWEEN NGET AND BM PARTICIPANTS**

Thank you for the invitation to provide comments on the above Grid Code consultation dated 20<sup>th</sup> June 2011. The following response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Npower Renewables Limited and RWE Supply & Trading GmbH.

RWE was pleased to participate in the Working Group which developed the proposed change to the Grid Code. We are supportive of the proposed change and agree that it will help clarify the circumstances under which EDL would be required at a Control Point.

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  
RWE Supply & Trading GmbH

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Head Office:  
Essen, Germany  
Registered at:  
Local District Court, Essen  
Registered No.  
HR B 14327

## C/10-CR-03 (SSE)

### Email

Dear Sirs,

This response is sent on behalf of SSE Energy Supply Ltd., SSE Generation Ltd., Keady Generation Ltd., Medway Power Ltd., Slough Energy Supplies Ltd., Airtricity Ltd., Airtricity Generation (GB) Ltd. and SSE (Ireland) Ltd.

In relation to the consultation concerning Grid Code C/10 ("Grid Code Requirement for Electronic Communication Facilities between NGET and BM Participants") contained within your note of 20th June 2011 we agree with the view of the Working Group and National Grid that this seems a pragmatic approach which would better facilitate the Grid Code Objectives.

Regards

Garth Graham  
Scottish and Southern Energy plc



National Grid House  
Warwick Technology Park  
Gallows Hill, Warwick  
CV34 6DA

Mr John Morris  
Senior Transmission and Trading Advisor  
EDF Energy Corporate Policy and Regulation  
Barnett Way, Barnwood  
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Thomas Derry  
Commercial Analyst

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4<sup>th</sup> August 2011

Ref: C/10-CRR-01

Dear John,

**C/10 Grid Code Requirement for Electronic Communication Facilities between NGET and BM Participants**

Thank you for your response on 18<sup>th</sup> July 2011 to our consultation on proposals to modify the Grid Code requirements relating to Electronic Communication Facilities between NGET and BM Participants, Grid Code Consultation C/10.

National Grid received representations from three industry parties, all of which supported the proposed changes and the recommendations of the Working Group.

I anticipate the publication of the Final Report to the Authority no later than 5<sup>th</sup> August 2011. If you have any queries or outstanding issues, please contact me at [thomas.derry@uk.ngrid.com](mailto:thomas.derry@uk.ngrid.com).

Yours sincerely

Thomas Derry  
Commercial Analyst  
Electricity Codes  
National Grid

National Grid is a trading name for:  
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Mr John Norbury  
RWE Supply & Trading GmbH  
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4<sup>th</sup> August 2011

Ref: C/10-CRR-02

Thomas Derry  
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www.nationalgrid.com

Dear John,

**C/10 Grid Code Requirement for Electronic Communication Facilities between NGET and BM Participants**

Thank you for your response on 12<sup>th</sup> July 2011 to our consultation on proposals to modify the Grid Code requirements relating to Electronic Communication Facilities between NGET and BM Participants, Grid Code Consultation C/10.

National Grid received representations from three industry parties, all of which supported the proposed changes and the recommendations of the Working Group.

I anticipate the publication of the Final Report to the Authority no later than 5<sup>th</sup> August 2011. If you have any queries or outstanding issues, please contact me at [thomas.derry@uk.ngrid.com](mailto:thomas.derry@uk.ngrid.com).

Yours sincerely

Thomas Derry

Commercial Analyst  
Electricity Codes  
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Mr Garth Graham  
Scottish and Southern Energy plc

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4<sup>th</sup> August 2011

Ref: C/10-CRR-03

Dear Garth,

**C/10 Grid Code Requirement for Electronic Communication Facilities between NGET and BM Participants**

Thank you for your response on 20<sup>th</sup> July 2011 to our consultation on proposals to modify the Grid Code requirements relating to Electronic Communication Facilities between NGET and BM Participants, Grid Code Consultation C/10.

National Grid received representations from three industry parties, all of which supported the proposed changes and the recommendations of the Working Group.

I anticipate the publication of the Final Report to the Authority no later than 5<sup>th</sup> August 2011. If you have any queries or outstanding issues, please contact me at [thomas.derry@uk.ngrid.com](mailto:thomas.derry@uk.ngrid.com).

Yours sincerely

Thomas Derry

Commercial Analyst  
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