

**Joint Grid Code and Distribution Code Review Panels Working Group  
Implementation of Technical Requirements for Licence Exempt Embedded  
Medium Power Stations**

**Minutes of Fifth Meeting held on 18 June 2004 at NGT House, Warwick**

Present

Patrick Hynes	National Grid (Chair in Ben Graff's absence)
Sue Newbould	National Grid (Technical Secretary)
Claire Maxim	Powergen
John Norbury	Innogy
Nigel Turvey	Western Power
Chris Berry	SP PowerSystems
Bridget Morgan	Ofgem (observer)

Apologies

Mike Kay	United Utilities
Guy Nicholson	Econnect
Ben Graff	National Grid

**Apologies for absence**

1. BG was unable to attend the meeting and in his absence the WG agreed for PH to stand in as Chair.

**Review of minutes of 4<sup>th</sup> Meeting held on 12 May 2004**

2. The minutes circulated prior to the meeting, together with the additional expansion sent by JN to the WG, in his email of 2 June 2004, were agreed as being accurate.

**Review of actions**

3. The outstanding actions were reviewed. The attached schedule contains both a summary of the outstanding actions and the new actions resulting from this meeting.
4. With respect to Action 12/5/04 18, PH explained that the CUSC will need to describe the relationship between NGC and the DNO and how the obligations are passed through.
5. With respect to Action 12/5/04 24, CM expressed her view that there is no clear and transparent and market orientated route for LEEMPS to despatch frequency response. The WG decided to park the issue and revisit it when the meeting reviewed the paper on the interaction between LEEMPS and BC3/CC.8.1.

**Review of Gantt Chart**

6. The WG reviewed the high level outline of the typical connection process for an Embedded Medium Power Station produced by CB.
7. The WG agreed that Task 3 of the outline Gantt chart ("Notify NGC of application") would require a more formalised CUSC 6.5.1 notice.
8. JN highlighted the risk to the generator of knowing the DNO's costs but not NGC's costs during the 3 months connection offer validity period if the

Modification Application route is required. It was pointed out that this happens now and generators appear to manage it. In general this type of issue should be raised within the CUSC forum.

9. NGC advised that they would need to know the connection option before they could carry out their technical assessment and that they should be able to carry out the assessment in 28 days. The generator representatives advised that generators do not place contracts until a signed offer was in place and all consents obtained.
10. JN advised that the committed generator does not tend to be too different to the preliminary data. JN commented that the consequence of this new process is that the accurate data requirements are being brought forward. An action was placed on NGC to identify what data NGC requires at Tasks 3 and 10 of the Gantt chart.

### **Review of swim lane diagram**

11. The WG identified that the information coming out of the NGC box was incorrect if infrastructure works were triggered by the embedded generator. If NGC's impact assessment identifies the need for infrastructure works then NGC would need an agreement with the DNO delaying the connection until the infrastructure works are complete and requiring security for the H Part 1 works. The DNO would back this off in their agreement with the embedded generator. The diagram therefore needs amending to reflect this (new action 18/6/04 5).
12. PH advised that if NGC has a Compliance Statement together with satisfactory supporting evidence then NGC should not need to test the MPS. CM pointed out that this did not tie in with Generic Provisions thinking. An action was placed on NGC to include on the diagram what OC5 is to achieve.

### **Review of BC3 paper (Interaction between LEEPMS and BC3/CC.8.1)**

13. JN thought the reference to pre-NETA in PH's paper was irrelevant because the world has moved on.
14. JN said that LEEMPS referred to in the paper are windfarms and if they are licence exempt then they are not subject to the Grid Code because CC.6.3.1 of the Grid Code carves them out. PH stated that whilst it was the generators' view that the Grid Code does not apply to renewable energy plant, it was NGC's view that the Grid Code did apply on the basis that the plant could be designed to apply.
15. JN advised that whilst he is supportive of much of the existing arrangements being in BC3 rather than in separate agreements, his problem is with the Connection Conditions requiring LEEMPS to have the frequency response capability rather than with BC3 itself. PH explained that he was trying to concentrate on the contractual obligations and mechanisms.
16. The generator representatives highlighted that frequency response capability has a cost. This has been debated at Generic Provisions and the Grid Code Review Group. NGC's latest information from developers was that there was no ongoing cost.
17. PH advised he had pointed out in his paper that there is an anomaly in CC.8.1 in that the MPS has the capability and therefore needs to sign an MSA. JN does not agree that CC.8.1 says the capability has to be provided

through an agreement but that it says the obligation is via the CUSC to enter into an MSA (as required in the Grid Code).

18. PH suggested if the WG in general believed the GC only required a capability for ancillary services but not to actually provide it (this is through the CUSC) then we would remove the GC drafting in relation to this.
19. The WG was informed that NGC was investigating how a LEEMPS could provide a service if not party to the CUSC or a BMU.
20. A discussion took place as to where the issue on capability of MPS lies and whilst the WG thought it might be with Generic Provisions it was agreed that it was not within the scope of this WG. It was agreed that the generators' view on this issue should be noted in the final report to the GC/DC Review Panel.
21. PH advised the WG that the other main change to be clarified was in the area of limited frequency response. The scope of BC3 does not apply to these generators. PH said it is arguable that they need to run in CC.6.3.3 mode although NGC believed they should. JN was inclined to think MPS should comply with CC.6.3.3. JN thinks the capability on CC.8.1 is different, NGC accepted this view. DNOs queried whether requirements in G75 as mentioned in the DNO Connection Agreement are different in the Grid Code. The WG agreed that the best way forward on this issue was not to change BC3 but to take the issue forward to the Panel to review it separately. There is no default requirement unless BC3 applies to the power station. CB advised that there may also be an impact on the DNO's connection offer. An action was therefore placed on the DNOs to identify the changes required in their pro forma connection offer.

#### **Review of OC5 drafting**

22. PH informed the WG that the changes made mean that NGC does not as routine test the set but looks for evidence that the MPS complies with the requirements.
23. JN still has the question as to who pays the DNO costs for facilitating testing. An action was noted to determine this.
24. JN had a query on the testing of type of unit. He explained that he does not want obligations on a "Generating Unit" falling on to a "Module". NGC agreed to take this on board.
25. PH asked the WG to email him any comments they may have on OC5.

#### **Review of PC drafting**

26. PH advised the WG that he had taken on board comments from the previous meeting and has summarised the main changes that have been made to the drafting in his circulated note.
27. With regards to CC.4.4.3, JN thought that the data the generator submits to the DNO should probably be formalised to include Grid Code requirements. The WG thought the DNO would then copy the Grid Code data to NGC. There is an outstanding action on PH to produce a table of data required in the GC.
28. PH asked the WG to email him any detailed comments they may have on PC.

### **Review on CC drafting**

29. A minor amendment to the drafting was noted (new action 18/6/04 14).
30. JN queried why the list of managers was required in CC.5.2.2(e). PH advised that the obligation is an existing one and is not being changed.
31. It was clarified that CC.5.3(b) is referring to a MPS connecting to a DNO at the DNO's connection site with NGC.
32. PH asked the WG to email him any comments they may have on CC.

### **Distribution Code drafting**

33. An action was placed on the DNOs to review and re-draft DOC5 and DPC7.

### **Next Steps**

34. Comments on drafting to be sent to PH by 25 June 2004.
35. PH to produce table of data required for PCs and obligations in CCs.
36. NGC to update Gantt chart and swim lane diagram.
37. NGC to take forward the issue on limited frequency response to the Panel as separate item for resolution or identification of appropriate forum to take them forward.
38. DNOs to update D Code drafting ready for next meeting (see Next Meeting below).

### **Any other business**

39. In its original terms of reference, the WG aimed to complete its work for the GCRP and DCRP meetings taking place on 20 November 2003 and 27 November 2003. PH and BM advised that the target completion date is now "as soon as possible". BM informed the WG that the 3 derogations from certain sections of the Grid Code granted to date expire on 31 March 2006 and Ofgem gave the steer that earlier resolution should be made as soon as possible.
40. PH advised that it is not yet known whether the GC changes would lead to a consequential CUSC modification or the other way round. NGC would consider this and report back.
41. CZ suggested the work of the WG is done after the implementation of BETTA bearing in mind the changes to the Codes resulting from BETTA and the derogation expiry date of 31/3/06. BM said the industry did not like Licence Exempt Generation Agreements and they were a short term measure until a long term solution was found.

### **Next Meeting**

42. The sixth meeting of the WG will now be held on **Tuesday 3 August 2004** at NGT House, Warwick (B1-7) starting at 10:30, instead of the previously agreed date of Monday 16 August 2004. The meeting on the 3<sup>rd</sup> August will concentrate on D Code drafting.