



**GRID CODE
CONSULTATION DOCUMENT
and REPORT TO THE AUTHORITY**

**Proposed Changes to Grid Code OC8B in relation to
site specific safety instructions.**

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

Consultation Ref	E/05
Issue	1
Date of Issue	7 November 2005
Responses required by	9 December 2005
Prepared by	National Grid

DOCUMENT LOCATION

National Grid website:

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

DISTRIBUTION

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

A. Introduction

1. Paragraph 2 of Condition C14 of the Transmission Licence granted to the National Grid Electricity Transmission plc ("National Grid") provides that National Grid shall, in consultation with authorised electricity operators liable to be materially affected thereby, periodically review the Grid Code and its implementation. That paragraph also requires National Grid, following such review, to send to the Authority:-
 - (a) a report on the outcome of such review;
 - (b) any proposed revisions to the Grid Code as National Grid (having regard to the outcome of such review) reasonably thinks fit for the achievement of the objectives set out in sub-paragraph (b) of Condition C14 of the Transmission Licence; and
 - (c) any written representations or objections from authorised electricity operators (including any proposals by such operators for revisions to the Grid Code not accepted by National Grid in the course of the review) arising during the consultation process and subsequently maintained.
2. This review is concerned with Grid Code OC8B (Safety Co-ordination in Scotland) and the clarification of site specific safety instructions in Scotland. The proposed changes to the Grid Code were discussed with the Grid Code Review Panel on 22 November 2005 and Panel members agreed that having taken account of comments received from Panel members National Grid should issue a Consultation Paper.
3. The Report will be made publicly available on National Grid's website.
4. The revisions to the Grid Code proposed by National Grid and sent to the Authority require approval by that body and will, if approved, come into force on such date (or dates) of which you will be notified by National Grid, in accordance with the Authority's approval.
5. Comments should be sent to National Grid by **9 December 2005** as detailed below in section C. The comments will be reviewed, responded to and included in A summary in Section C.
6. Unless otherwise marked as confidential any responses including those containing objections to the proposals which are maintained will be published on our website.

B. DESCRIPTION OF THE PROPOSED AMENDMENTS AND THEIR EFFECTS

7. Background

- 7.1 Grid Code OC8 recognises the difference between the application of safety processes in England/Wales and Scotland. In England and Wales Users and NGC work to OC8A and in Scotland Relevant Transmission Licensees, RTLs, and Users work to OC8B. Although basically the same there are subtle differences that reflect the historic custom and practice. These differences come from the principle used

in combining the Grid Code for BETTA. This was that wherever possible there should be a minimal impact on safety processes.

- 7.2 This principle led to drafting OC8B without any recognition of Local Safety Instructions, LSIs. At the time of drafting the GB Grid Code it was understood that these did not exist in Scotland.
- 7.3 However, in preparing the site agreements for BETTA it was recognised that although LSIs do not exist there are similar specific procedures which are more detailed than the higher level Safety Rules referenced in OC8B.
- 7.4 While neither explicitly allowed, or prohibited by the Grid Code, the practice which was adopted in preparing for BETTA was to refer to these site agreements on the relevant Site Responsibility Schedules. By listing them on the Site Responsibility Schedules, both parties are required to work to the procedures.
- 7.5 Given the history of these documents and the particular place in the overall safety framework of the RTLs and Users it is considered inappropriate to 'shoehorn' them into the definition of LSIs. Equally, it would also be inappropriate to expand the definition of LSIs the GB Grid Code to cater for these additional procedures. These options would either introduce ambiguity and / or reduce clarity.
- 7.6 Therefore it is proposed to amend Grid Code OC8B to explicitly enable the RTL and Users to agree certain site-specific procedures for the application of Safety Precautions (i.e. Isolation and Earthing). The proposed change clarifies that they can exist, that they are consistent with the RISSP procedure, that both parties need to agree them and ensures that they will be listed on the Site Responsibility Schedule
- 7.7 In addition, the Grid Code already recognised that RTL may agree with the User to use different operational procedures for safety co-ordination instead of the RISSP procedure. Typically, these procedures have been used with demand users with sites directly connected to the transmission system in Scotland. As with the site specific procedures discussed above, it has been the practice to reference these alternative procedures on relevant Site Responsibility Schedules.
- 7.8 This proposal seeks to distinguish between these alternative procedures from the site-specific procedures referred to above. They are now referred to as "alternative" procedures instead of "detailed" procedures. The proposal also ensures that these alternative procedures are listed on the Site Responsibility Schedules.

8. Proposed Changes

- 8.1 It is proposed to amend OC8B.1.6 such that when the Relevant Transmission Licensee agrees alternative operational procedures with Users, that these alternative procedures are referenced in the relevant Site Responsibility Schedule.

- 8.2 It is also proposed to include additional sub sections under OC8B.1.6 to explicitly allow the RTL and Users to agree site specific procedures for the application of Safety Precautions that are an addition to and consistent with RISSPs already allowed under OC8B.1.6, and that these site specific-procedures are referenced on the relevant Site Responsibility Schedule.
- 8.3 The proposed changes to Grid Code OC8B.1.6 are shown in Appendix 1.

C. RESPONSES

9. This section will contain a summary of responses received during the Consultation and will be completed as part of the Report to the Authority.
10. Your formal responses may be:-

Posted to: Mark Duffield
Electricity Codes
Commercial Frameworks
National Grid Electricity Transmission plc
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Emailed to: mark.duffield@uk.ngrid.com

Appendix 1

Proposed changes to Grid Code OC8B.1.6

- OC8B.1.6 **(a)** The **Relevant Transmission Licensee** may agree **detailed alternative** site-specific operational procedures with **Users** for the co-ordination, establishment and maintenance of **Safety Precautions** instead of the **Record of Inter-System Safety Precautions (“RISSP”)** procedure detailed in this **OC8B**. Such operational procedures shall satisfy the requirements of paragraphs OC8B.1.7, OC8B.2.1, OC8B.4.1, OC8B.4.2, OC8B.9, OC8B.10. **These alternative site-specific operational procedures for the co-ordination, establishment and maintenance of Safety Precautions will be referenced in the relevant Site Responsibility Schedule.**
- (b)** **The Relevant Transmission Licensee may agree with Users site-specific procedures for the application of Safety Precautions across the interface between the Relevant Transmission Licensee and User in addition to and consistent with either the RISSP procedure or the alternative site-specific operational procedures described in OC8B.1.6 (a). These site-specific procedures will be referenced in the relevant Site Responsibility Schedule.**
- (c)** **The Relevant Transmission Licensee and the User shall comply with the procedures agreed pursuant to OC8B.1.6 (a) and OC8B.1.6 (b).**