



National Grid

A REPORT TO THE AUTHORITY

**Pursuant to Paragraph 2 of Condition 7 of the
Transmission Licence.**

PROPOSED GRID CODE MODIFICATION

**Use of E-Mail for the Communication of Data,
Information and Notices**

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

Consultation Paper Ref	E/01
Report Issue	1
Date of Issue	7 th December 2001
Prepared by	National Grid

DISTRIBUTION

Name	Organisation
The Authority	Ofgem
Grid Code Review Panel Members	Various

1. Paragraph 2 of Condition 7 of the Transmission Licence granted to the National Grid Company 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 1(b) of Condition 7 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. NGC has just completed a review of the Grid Code. This review relates to the Grid Code provisions dealing with the use of e-mail for data, information and notices. Attached as Appendix A are the proposed revisions to the current Grid Code Glossary and Definitions Construction of References and General Conditions (shown in typed form with the deletions crossed through and additions double underlined).
3. The proposed changes to the Grid Code were discussed at the Grid Code Review Panel on 13th September 2001 and it was agreed that NGC should issue a Consultation Paper.
4. NGC, in accordance with its obligations under its Transmission Licence, consulted those authorised electricity operators listed in Appendix C by circulating to them Consultation Paper E/01, which was dated 24th September 2001 and which contained the proposed amendments to the Grid Code. A copy of Consultation Paper E/01 is attached to this Report as Appendix B. NGC also placed a copy of the Consultation Paper on its website to ensure its wide availability.
5. Comments were invited from all such authorised electricity operators by 26th October 2001. NGC has received responses from 7 authorised electricity operators. All of the respondents were in favour of the proposed Grid Code changes, although several of the responses contained comments related to protocols and implementation matters. NGC has responded to each of them and no further changes were identified as a result of the responses.
6. The proposed revisions to the Grid Code are, as indicated above, set out in Appendix A to this Report. By way of summary, the proposed changes are described below :-

Background

- 6.1 When the Grid Code was first produced approximately 11 years ago data and information was exchanged between Users using traditional methods and the technology of the day. This generally made use of the postal system. The use of e-mail as a means of communication was then in its infancy, but with the advent of quicker and more powerful computing devices the use of e-mail for transmitting information and data has become routine.
- 6.2 The Grid Code contains many references to 'in writing' or 'written', which are defined in Section 2 (vi) of the Glossary and Definitions to include typewriting, printing, lithography and producing words in other non-transitory forms. These generally relate to the form in which information needs to be given. In addition, the Grid Code contains references to the form of submission of data and notices. These are principally in the General Conditions, although there are further references in the Grid Code to the provision of data 'by post'.
- 6.3 In many instances data, information and notices could effectively be provided by e-mail, but in so doing non-compliance with the Grid Code may result unless e-mail is included as a method of communication.

The Proposed Changes

- 6.4 It is proposed that the General Conditions (GC.6.1.1) is amended to include 'electronic mail to a specified address' in the list of delivery methods. In addition it is proposed that the Glossary and Definitions – Construction of References (vi), which deals with the meaning of 'in writing', is amended to include 'electronic communication' in the list of references and that this paragraph is then relocated to GC.6, as this is a more logical location. Approaching the changes in this way avoids having to alter every reference to 'in writing' and like terms to add the concept of an electronic copy as well' The proposed amendments to the Construction of References and GC.6 are given in Appendix A.
- 6.5 It is further proposed that GC.6.1.1 could be clarified such that it is clear that data and notices can be sent either to National Grid or to Users. It is also proposed that the terms 'registered' and 'telex' can be deleted from the text as it is unlikely that either of these forms are used any longer.
- 6.6 There are several Grid Code paragraphs where the terms 'in writing' or 'written' are used in a context other than communication between National Grid and Users and as such do not fall within the scope of this consultation. For information the Grid Code paragraphs referred to are as follows:

OC1.6.2
OC7.4.8.1
OC8.2.2
OC8.4.3.5
OC9.4.7.11(b)(vii)
OC12.4.6.1
G&D – Definition of RISSP

- 6.7 The way in which it is proposed to change the meaning of 'in writing' and 'written' means that the current meanings of these provisions remain unaltered. The intention of this proposal is to enable the use of an additional method of communication as an alternative to those already detailed in the Grid Code. The sender and receiver of electronic communications would be expected to make the necessary arrangements to ensure that data and information communicated can be read and acknowledged, just as is expected with communications by any other means, and these arrangements are not considered as being part of the explicit requirements of the Grid Code, but merely part of the general requirement on National Grid and Users to comply.
7. As indicated above, having regard to the outcome of the review described in this Report, National Grid proposes the revisions to the Grid Code set out in Appendix A, which revisions we reasonably think fit for the achievement of the objectives referred to in sub-paragraph (b) of paragraph 1 of Condition 7 of the Transmission Licence. In view of this, National Grid would be grateful if the Authority would approve the revisions pursuant to paragraph 3 of Condition 7 of the Transmission Licence.
8. Given the logistic exercise of organising replacement pages to reflect the changes required by your letter of approval, I would be grateful if you would contact me prior to issuing any letter specifying an effective date, in order to seek to ensure that the date is consistent with any other Code changes which may then be approved or be close to being approved.

SIGNED BY

For and on behalf of The National Grid Company plc
xx 2001

Appendix A

Extract from Glossary and Definitions – Construction of References

- ~~(vi) references to "in writing" or "written" include typewriting, printing, lithography and other modes of reproducing words in a legible and non-transitory form;~~
- (vii) where the **Glossary and Definitions** refers to any word or term which is more particularly defined in a part of the **Grid Code**, the definition in that part of the **Grid Code** will prevail over the definition in the **Glossary & Definitions** in the event of any inconsistency;
- (viii) a cross-reference to another document or part of the **Grid Code** shall not of itself impose any additional or further or co-existent obligation or confer any additional or further or co-existent right in the part of the text where such cross-reference is contained;
- (ix) nothing in the **Grid Code** is intended to or shall derogate from **NGC's** statutory or licence obligations;
- (x) a "holding company" means, in relation to any person, a holding company of such person within the meaning of section 736, 736A and 736B of the Companies Act 1985 as substituted by section 144 of the Companies Act 1989 and, if that latter section is not in force at the **Transfer Date**, as if such latter section were in force at such date;
- (xi) a "subsidiary" means, in relation to any person, a subsidiary of such person within the meaning of section 736, 736A and 736B of the Companies Act 1985 as substituted by section 144 of the Companies Act 1989 and, if that latter section is not in force at the **Transfer Date**, as if such latter section were in force at such date;
- (xii) references to time are to London time; and
- (xiii) Where there is a reference to an item of data being expressed in a whole number of MW, fractions of a MW below 0.5 shall be rounded down to the nearest whole MW and fractions of a MW of 0.5 and above shall be rounded up to the nearest whole MW.

< End of GD >

Extract from General Conditions

GC.6 MISCELLANEOUS

GC.6.1 Data and Notices

GC.6.1.1 Data and notices to be submitted either to NGC or to Users under the **Grid Code** (other than data which is the subject of a specific requirement of the **Grid Code** as to the manner of its delivery) shall be delivered in writing either by hand or sent by ~~registered~~ first-class pre-paid post, or by ~~telex or~~ facsimile transfer or by electronic mail to a specified address or addresses previously supplied by NGC or the User (as the case may be) for the purposes of submitting that data or those notices.

GC.6.1.2 References in the Grid Code to “in writing” or “written” include typewriting, printing, lithography, and other modes of reproducing words in a legible and non-transitory form and in relation to submission of data and notices includes electronic communications.

GC.6.1.~~23~~ Data delivered pursuant to paragraph GC.6.1.1, in the case of data being submitted to **NGC**, shall be addressed to the National Grid Control Centre at the address notified by **NGC** to each **User** prior to connection, or to such other Department within **NGC** or address, as **NGC** may notify each **User** from time to time, and in the case of notices to be submitted to **Users**, shall be addressed to the chief executive of the addressee (or such other person as may be notified by the **User** in writing to **NGC** from time to time) at its address(es) notified by each **User** to **NGC** in writing from time to time for the submission of data and service of notices under the **Grid Code** (or failing which to the registered or principal office of the addressee).

GC.6.1.~~34~~ All data items, where applicable, will be referenced to nominal voltage and **Frequency** unless otherwise stated.

Appendix B
Consultation Paper E/01

APPENDIX C

AEO Distribution List for Consultation Paper E/01

Accord Energy Limited
AES (for Barry Ltd + Fifoots Point Ltd + Partington Ltd + Drax Ltd)
AES Indian Queens Power
Alcan Aluminium UK Ltd
Allied Steel & Wire
Aquila Energy Supplies Ltd
Atlantic Energy (UK) plc
Barking Power
BNFL + Magnox Electric Ltd
BOC Limited
BP Chemicals Ltd
British Energy Generation Ltd
British Energy Investment (no 2) Ltd
British Energy Retail Markets Ltd
British Gas Plc
British Gas Trading Ltd
British Steel plc
Celtpower Ltd
Cinergy Global Power (UK) Ltd
Commercial Electricity Supplies Ltd
Conoco Global Power (UK) Limited
Corby Power Ltd
Coryton Energy Co Ltd
Cottam Development Centre
Damhead Creek Ltd
Derwent Co-Generation Limited
East Midlands Electricity
Eastern Electricity (distribution)
Eastern Energy Ltd
Economy Power Ltd
Edison First Power Ltd
Electricite de France
Electricity Direct (UK) Ltd
Energy Power Resources Limited
Enfield Energy Centre Ltd
Enron Direct Ltd + Enron Gas & Petrochemical Trading
Enron Teesside Operations Ltd
Fellside Heat & Power Ltd
First Hydro Company
Great Yarmouth Power Limited
Heartlands Power Ltd
Humber Power Ltd
ICI Chemicals & Polymers Ltd
Impkemix Energy Ltd
Independent Energy UK Ltd
Innogy + NP (Cogen Trading) Ltd
Keadby Development Ltd
Keadby Gen Ltd + HE Cogen Ltd + HE Energy Ltd
Lakeland Power Ltd
London Electricity plc
London Energy Company Ltd
MANWEB plc
Marubeni Europower Ltd
Medway Power Ltd
Midlands Electricity plc
Midlands Power (UK) Ltd
Norsk Hydro (UK) Ltd
Northern Electric Distribution Ltd
Northern Electric Supply Ltd
Norweb (supply)
NORWEB plc (distribution)
Pentex Oil and Gas Ltd
PowerGen UK plc + PowerGen CHP Ltd
Railtrack plc
Regional Power Generators Limited
Renewable Energy Co
Rocksavage Power Company Ltd
Saltend Cogeneration Co Ltd
Scottish and Southern Energy plc
Scottish Power plc
Seabank Power Ltd
SEEBOARD plc (distribution)
SEEBOARD plc (supply)
Shell Power Ltd
Slough Energy Supplies Ltd
South Coast Power Ltd
South Wales Electricity plc
South Western Electricity plc
Southern Electric
Southern Energy UK Generation Ltd
Spalding Energy Company Ltd
Sutton Bridge Power Ltd
Teesside Power Ltd
TXU Europe
TXU Europe Merchant Generation + Peterborough Power Ltd + Anglian Power Generators + Shotton CHP Ltd + Citigen (London) Ltd
UK Electric Power Ltd
UKAEA
Unit Energy Limited
Wainstones Power Ltd
Yorkshire Electricity Group plc (distribution)
Yorkshire Electricity plc (supply)