

Your ref B/07

Our ref

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16<sup>th</sup> April 2007

Dear Lilian,

**Grid Code Consultation – Improved planning code data exchange for compliance assessments B/07**

I'm writing on behalf of Northern Electric Distribution Limited (NEDL) and Yorkshire Electricity Distribution plc (YEDL), the licensed electricity distributors of CE Electric UK Funding Company Ltd.

In general, we are supportive of the proposals to improve the data exchange as described the consultation document as they should improve the transparency of the security of supply assessment process and ultimately improve the security of supplies to customers. However, we do have concerns that the proposals do not assist DNO to demonstrate compliance with ER P2/6 and that the resources that will be required to implement the proposals, particularly in the initial years, will be significant. Therefore we are of the view that these proposals should only be implemented in conjunction with clarification from Ofgem relating to the application of ER P2/6 at Grid Supply Points (GSP) with a view to avoiding unnecessary duplication of security analysis.

This letter focuses on those areas where responses are invited in the consultation document.

**Assessment against ER P2/6**

The terms of reference for the working group required that consideration be given to the need to modify the Planning Code and Data Registration Code so as to ensure that NGET and DNO have information available so that they can plan and develop their networks in accordance with their respective licence requirements. The discussions within the working group have centred round the requirements of the Grid Code, particularly relating to the Week 24 Submission. The report quite rightly recognises that robust data exchange, via the Week24 process, is required so that NGET can plan their network in accordance with the GB SQSS however, this does not imply that implementation of these proposals would help the DNO plan and develop a network that is compliant with ER P2/6 at the GSP. There are several issues that need to be considered:

- 1 When assessing the compliance of a GSP, there is generally a need to undertake network modelling using a computer based analysis package. These proposals will improve the

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capability of National Grid to model the implications of various outages at the GSP by requiring defined data sets to be exchanged in defined timescales. Although there are proposals for improving the data provided by National Grid to the DNO, there is not the same robustness in either the data scope or timeframe for it to be made available. In summary, whilst National Grid is well placed to model the implications of outages on the transmission system and parts of the distribution system, these proposals do not place the DNO in an equivalent position.

- 2 It was recognised in the working group discussions that demand data, particularly in networks containing distributed generation, required by the Week 24 process is different from that specified in Engineering Recommendation P2/6, and the supporting Engineering Technical Report. This means that the DNO network demand which NGET use to assess their system against GB SQSS can be different to that used by the DNO when making an ER P2/6 assessment.
- 3 The working group also discussed the point that the assessment of security contribution from distributed generation as described in ETR 130 and 131 was different to the process by which generation could be considered to reduce the demand that could be expected to be present at a GSP. Hence the security contribution from distributed generation considered by National Grid when assessing the system against GB SQSS will be different to that used by the DNO when making an ER P2/6 assessment.

In summary, whilst it is recognised that if the proposals are implemented, there would be benefits to the customer and to National Grid when planning the transmission network to meet the requirements of the GB SQSS it is our view that these proposals would not help the DNO plan its own network to meet the requirements of ER P2/6.

### **Resource requirements**

The Consultation Document recognises that, if implemented, there will be resource implications for National Grid and the DNOs. We have made an initial assessment of the additional resources required to implement the proposals based on our understanding of the proposals and the draft data reporting schedules. Our assessment is that total additional resource, for CE Electric UK to prepare and submit the information relating to YEDL and NEDL networks, will be 50 man days for the first year of implementation and 28 man days for subsequent years. The additional initial resource requirements arise from the need to:

- Explain the changes to engineers compiling the data submission and resolving teething issues with National Grid;
- Develop the initial view of Access Groups and Maintenance Period; and
- Modify the present data extraction systems

The additional annual resources arise from the need to consider the implications for every possible combination of outages for each Transmission Interface Circuits within an access group. For each of these outages there is a need to for the engineer collating the data to understand the post outage operational action, assess the changes to the single line diagram, collate / present the demand data of the connection site and where applicable other connection sites within the same access group. It is accepted that some of the information required will relate to several different outages, depending on the electrical symmetry of the connection site and the additional resource estimates make allowance for these synergies.

We accept ensuring that the capability of a GSP is adequate to meet the needs of customers is a joint responsibility between National Grid and the DNO, however, there appears to be very little merit in continuing with the present approach which appears to require National Grid and the DNO to undertake very similar analysis using slightly different data to assess the compliance of the same assets against slightly different technical standards. To do so would result in wasting relatively scarce and expensive engineering resources. At a typical GSP it is the National Grid assets that provide the bulk of the system security to the demand supplied from the substation. ER P2/6 permits the DNOs to consider the lower voltage GSP busbars, which generally are owned and operated by the DNO, to be considered on their merits. It therefore seems reasonable that as National Grid are best placed to undertake the security assessment, with the support of the DNO, of GSPs against the GB SQSS that such an assessment should be sufficient to confirm adequacy of the assets at the GSP without the need for the DNO to undertake an ER P2/6 assessment. This would align well with the situation at shared GSPs where the low voltage busbars are owned by National Grid, and hence consideration of the busbars falls naturally to National Grid. Assessing compliance of the outgoing circuits from a GSP would continue to be assessed against ER P2/6 by the DNO.

Before such an approach could be adopted confirmation of its acceptability would be required from Ofgem that it is an acceptable interpretation of the DNO Standard Licence Condition 5.

#### **Further improvements**

Appendix 1 details a number of suggested improvements to the draft legal text. Some of these relate to changes that have been made after and as part of compiling the latest version of the working group report, but were not discussed within the working group.

In summary, it is our view that the proposals do not help DNOs comply with ER P2/6 and that as such the additional resource requirements for the DNO cannot be justified. However we would fully support the proposals if they were implemented as part of a package clarifying with Ofgem that there was no need for the DNO to undertake a second security assessment at GSP against ER P2/6 where National Grid has made an assessment against the GB SQSS in conjunction with the DNO. There are also several changes to the legal text which we believe should be incorporated in the final proposals for Ofgem to consider.

Please contact me if there are any issues arising from this letter that would benefit from further clarification.

Yours sincerely

Sent by email 16 April 2007

Alan Creighton  
Asset Management Lead Engineer

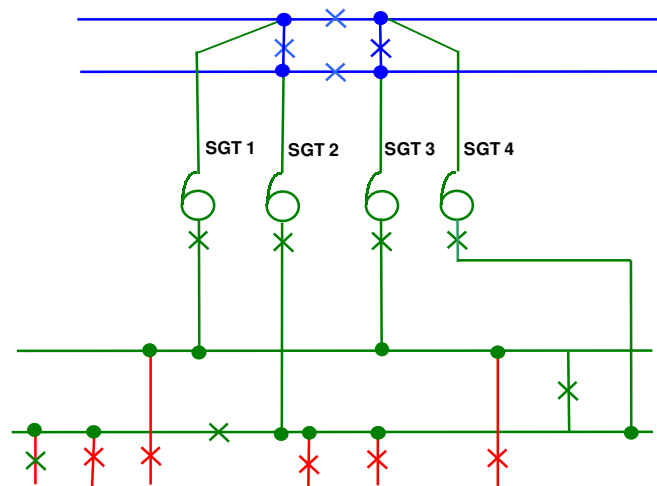
## Appendix 1

Comments on the proposed legal text:

Ref	Section	Issue	Proposal
1	Definition	The definition of a Transmission Interface Circuit is only correct where the LV busbars are owned by a User. Where they are owned by NGET, the TIC includes the SGTs, LV circuit breakers and the LV busbars (see Diagram 1) – hence there is only one TIC	Revise the definition to add clarity
2	PCA 4.1.4.4 parag 2	The requirement should be for National Grid to submit the required information <i>by</i> week 6 rather than <i>in</i> week 6	Revise to read: For all other <b>Access Groups</b> , <b>NGET</b> shall be responsible for submitting the information in (a) and (b) above to the relevant <b>Users</b> <i>by</i> Week 6.
3	PCA 4.1.4.4 parag 2	There should not be a prescriptive requirement for NGET and relevant Users to physically meet to discuss the maintenance period submission. The requirement should be to jointly agree the maintenance period submission by week 17	Revise to read: Following the submission by the <b>User</b> or <b>NGET</b> in week 6 in each year and where required by either party, both <b>NGET</b> and the relevant <b>User(s)</b> shall use their reasonable endeavours <i>to agree</i> appropriate week 6 submissions prior to week 17 in each year.
4	PCA 4.1.4.4, 5 & 6	The PCA 4.1.4.4 requires that for joint user sites the maintenance periods are agreed (as far as reasonably practicable) by week 17, yet the draft obligation on NGET is to confirm concurrent maintenance period to Users by week 10. Clearly where there are joint users, the maintenance periods may not be agreed until week 17 and NGET would be unable to meet the week 10 obligation.	Redraft so that that the timescales co-ordinate
5	PCA 4.1.4.5	The text refers to NGET making an initial view of the concurrent outages, the implication being that later on in the process NGET may develop another view. This may require the user to provide further information later in the process.	Delete 'initial': Where it is not possible to avoid overlapping maintenance slots, <b>NGET</b> will indicate to <b>Users</b> by calendar week 10 <i>its view</i> of which <b>Transmission Interface Circuits</b> will need to be considered out of service concurrently for the purpose of assessing compliance to <b>Licence Standards</b> .
6	PCA 4.2.2 c	Parag c refers to the submission by the User, yet at a shared site the information is submitted by National Grid and (hopefully) agreed by the Users.	Revise to read: the relevant <b>Maintenance Period</b> for each <b>Transmission Interface Circuit</b> . (as submitted by the <b>User</b> pursuant to PC.A.4.1.4.4 <i>or as submitted by NGET to the Users and subsequently agreed by the Users</i> ); and
7	PCA 4.2.2 d	Clarification that the concurrent maintenance outages to be considered are in the same access group	Revise to read Concurrent maintenance outage of two or more <b>Transmission Interface Circuits</b> <i>in the same Access Group</i> (if any).
8	PCA 4.3.2 (a) & (c)	Parag (c) appears to be a general summary of the requirement that is supplemented by the requirements of (a)	Relocate (d) to the start of the list
9	PCA 4.5.1 ii)	Typo	... considerd ...
9	PCA 4.5.1 iv	Typo	... <b>User's</b> ...
10	PCA 4.5.1 Parag 2	There needs to be clarity regarding those situations when demand transfer on a Users system would be made available to enable National Grid to assess whether their	Replace the Parag with: The <b>User</b> must not submit any action that it does not <i>have the capability or the intention to implement</i> during the

	<p>available to enable National Grid to assess whether their system is compliant with SQSS. The Consultation Document (6.5.6 &amp; 6.5.7) does not fully reflect the discussions of the Working Group as captured in V2.0 of the report. The availability of transfer capacity is a key issue as depends on the Users view of the risks that he is prepared to expose connected customers to in order to maintain compliance. The lower the degree of acceptable risk the greater the investment required in either the transmission or distribution networks. Submission of demand transfers that are 'feasibly achievable' (i.e. could physically be implemented) but which the User would choose not to implement would be misleading as it may result in a system being considered to be compliant in theory only.</p>	<p>assessment period (subject to there being no further unplanned outages on the <b>User's User System</b>).</p>
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**Diagram 1**



- GB Transmission System
- Users System
- Transmission Interface Circuit

**From:** Harris, John P (Central Networks) [mailto:JohnP.Harris@central-networks.co.uk]  
**Sent:** Friday, April 13, 2007 5:09 PM  
**To:** Macleod, Lilian  
**Cc:** Eddleston, Simon (Central-Networks); Meredith, Daniel (Corp); Edwards, Tara (Central-Networks); Hill, John (Central-Networks); Chamberlain, Ralph  
**Subject:** B07 Grid Code Consultation Document

Lilian,

With reference to section 10.0 "Views Invited" page 20 of the B07 Grid Code Consultation Document, Central Networks have the following comments:-

We estimate that these changes to the grid code will involve a one off extra 60 working man days to alter our applications, this will involve changing database code and spread sheets etc.

We also estimate that these changes will require a continues yearly increase in workload of from 50 to 70 man days.

Total Increase in Workload

Initial Year	Following Years
110 to 130 man days	50 to 70 man days

We do agree that these changes to the grid code would be beneficial.

Regards

John Harris

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Mark Duffield  
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16 April 2007

Dear Mark,

**Grid Code Consultation - B/07  
Improved Planning Code Data Exchange for Compliance Assessments**

I refer to the consultation document sent out on 16 March.

EDF Energy appreciates the need to improve the data exchange between our organisations and generally supports the recommendations of the Working Group. In fact we have already begun to develop processes to provide the new information. This will, of course, involve us in considerable additional work and we recognise that it will similarly affect National Grid staff. I believe that we already have a good working relationship in respect of the Week 24 returns and would expect this relationship to be a positive factor in ensuring that the new requirements are effectively delivered.

Notwithstanding our general acceptance of the proposals there are two specific areas that remain of concern to EDF Energy. These relate to interpretation of the situation where NGET identifies a 'possible future non-compliance' (PC.7) and the arrangements for dealing with shared sites (PC.A.4.1.4.4).

**PC.7**

The drafting of this section, and in particular PC.7.2 and PC.7.3, gives NGET sole discretion to decide (in its reasonable opinion) that a future non-compliance could exist, which could lead (in PC.7.3) to the identification (by NGET) of the need for additional plant and/or apparatus to be installed by NGET and/or the User etc. Given the notional nature of the designated 8-week Maintenance Period, there will invariably be scope for discussions, and possibly differences of opinion, between NGET and the User over the nature of the potential 'non-compliance'. It may be possible that a practicable solution could be identified in the specific case that does not entail additional plant or apparatus, or at the very least defers any such need. PC.7.3 acknowledges that further discussions may take place, and informal discussions with National Grid staff have sought to reassure us on this point during the development of these changes, but the legal text, as drafted, would seem to expose the User to a chain of events over which they have very little influence.

Our feeling is that further consideration should be given to this part of the Code to encourage the reaching of an agreed interpretation between NGET and the User (to address Ofgem's original concerns as expressed in Annex 2) before moving to a position that could lead to the Modification process. A possible amendment to the relevant section of PC.7 is offered for consideration.

*Following any notification by NGET to a User pursuant to PC.7.2 and consequent upon any agreed interpretation that may be reached during ~~following any~~ further discussions that the User may hold with NGET, the User shall as soon as reasonably practicable either:*

- (i) submit further relevant data to NGET that is to NGET's reasonable satisfaction; or,*
- (ii) modify data previously submitted pursuant to this PC, such modified data to be to NGET's reasonable satisfaction; or*
- (iii) notify NGET that it is the intention of the User to leave the data as originally submitted to NGET to stand as its submission.*

#### **PC.A.4.1.4.4**

For Access Groups containing Connection Points that supply more than one User's User System (i.e. shared sites) the present drafting requires NGET to submit Maintenance Period information to the Users in Week 6. We have already queried (at a meeting in Wokingham on 15th February) why this information cannot be provided earlier. The demand data for maintenance periods can, in theory, be compiled immediately following British Summer Time, and it is our intention to work on this data (for non-shared sites) as soon as it is available. This will then avoid the need to deal with maintenance period data at the same time as we process the existing Week 24 data. If we are required to wait until Week 6 for the shared-site maintenance periods (and agree them by Week 17), then this could impact on our ability to complete the maintenance period returns before we start the normal Week 24 data process. Waiting until Week 6 seems an unnecessary delay and will complicate what is already acknowledged to be a significant increase in work load. We see no reason why this date cannot be brought forward in the interests of smoothing the work load and would ask that this be seriously considered.

I hope that you will understand the reasons for our concern in these areas and feel able to recommend appropriate changes to address these concerns.

Yours sincerely



Bob Bassett  
System Coordination Manager  
Infrastructure Development, Capital Programme



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Claire Maxim  
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Monday 26<sup>th</sup> March 2007

Dear Lilian,

**Grid Code Consultation B/07 – “Improved Planning Code Data Exchange for Compliance Assessments” – E.ON UK Response**

Thank you for the opportunity to comment on the proposed changes to the Grid Code regarding Planning Code Data Exchange. This response is on behalf of E.ON UK plc, Enfield Energy Centre Ltd and Cottam Development Centre Ltd.

I note both from the presentation to the Grid Code Review Panel in February 2007, and from the consultation document, that the proposed changes are intended to affect the data exchange between Network Operators and the System Operator. I am concerned that PC.7 as drafted apparently applies to all Users, not just to Network Operators.

I suggest that if the wording is not intended to apply to all Users, then that should be made clear. If it is intended to apply to all Users, then the Working Group has strayed beyond its Terms of Reference, and a new proposal and new Working Group should be convened to enable proper consultation.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Claire Maxim  
Lead Contract Manager

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From: david.m.ward@magnox.co.uk [mailto:david.m.ward@magnox.co.uk]  
Sent: Thursday, March 15, 2007 11:18 AM  
To: Macleod, Lilian  
Subject: Grid Code Consultation B/07

To:

Lilian Macleod  
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Warwick, CV34 6DA

(By email)

Lilian

Grid Code Consultation Paper B/07 Improved Planning Code Data Exchange for Compliance Assessments

This email is the formal response of Magnox Electric Ltd to the above consultation paper. Magnox Electric Ltd is managed by British Nuclear Group, and operates the Magnox Power Station sites on behalf of the Nuclear Decommissioning Authority.

The proposed change mainly affects Distribution Network Operators, but it does have a minor effect on generators such as Magnox Electric because of the proposed addition of the section on lumped susceptances into DRC schedule 5.

For our stations I would propose to enter "negligible" for this data item. If this is acceptable to National Grid, then I have no objections to the proposed modifications. The other requirements which cause increased data flows in respect of distribution network operators seem reasonable to me.

I hope my comments are helpful. They are not confidential

Regards

David Ward

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Name John Norbury  
Phone 01793 892667  
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27<sup>th</sup> March 2007

Dear Lilian

## **GRID CODE CONSULTATION DOCUMENT B/07 IMPROVED PLANNING CODE DATA EXCHANGE FOR COMPLIANCE ASSESSMENTS**

Thank you for the opportunity to comment on the above consultation paper. The following response is provided on behalf of the RWE group of companies. We understand that this consultation is intended to address certain shortcomings across the interface between the GB Transmission System and distribution networks with respect to the SQSS and, as such, the proposals are expected to apply solely to Distribution Network Operators and National Grid. We therefore do not believe it is within the scope of this consultation to propose changes that would affect the submission of data by Users other than Network Operators.

We are concerned that the proposed new paragraph PC.7.2 could be applied in respect of the submission of data under the Planning Code by Generators and/ or Suppliers with unintended consequences. This possibility does not appear to have been considered in the consultation. We therefore suggest that, for the avoidance of doubt, PC.7.2 be clarified as follows:

“Where, in **NGET’s** reasonable opinion, the data submitted by the **User** in respect of its obligations as a Network Operator and pursuant to this **PC** identifies possible future non-compliance with the relevant **Licence Standards** **NGET** shall notify relevant **User(s)** of this fact as soon as reasonably practicable.”

In addition to the above, regarding the drafting of paragraph PC.7.2, it would appear that NGET may notify several Users in response to data submitted by a single User. Please clarify if this would be the case. It is also difficult to understand how data submitted by a User would, by itself, identify possible future non-compliance with the relevant Licence Standards. Please clarify this point.

If you wish to discuss this matter further please do not hesitate to contact me.

Yours sincerely

By email  
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Network Connections Manager

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16 April 2007

Dear Lilian

### **Improved Planning Code Data Exchange for Compliance Assessment**

SSE agrees and supports of the need for greater clarity in determining GB SQSS and P2/6 compliance at the interface between DNOs and NGET i.e. at the Grid Supply Point i.e. normally known as Connection Point.

It is clear that the proposals will deliver these aims with respect to NGET compliance with GB SQSS provided there is constructive dialogue between the parties. However, I have to say, that the proposals do not strengthen the ability of DNO's to assess P2/6 compliance and do not resolve the differences in compliance standards at the interface. This is because the DNOs licence standard does not make any reference to maintenance period.

SSE agrees that the principles of collecting data for maintenance period will enable to complete compliance assessment more accurately than it is has been done to date. It is my concern that due to lack of direct discussion between NGET (as GBSO) and Scottish TOs the process may not work efficiently in Scotland.

SSE accepts the logic of the drafting of the Grid Code changes in achieving greater transparency of compliance assessment process, but I along with other DNOs remain concerned that the data collation and exchange will be resource intensive. Since the process has not been tested yet it is not possible to quantify the extent of extra resource needed by SSE. It is my initial best estimate, considering there are about 18 GSPs in SEPDs area and about 80 GSPs in SHEPD's area, that there could be about one man years of extra effort in SEPD and about two man years of effort in SHEPD's area. My suggestion would be that before implementing the proposals a trial period, say the year 2007/08, is used followed by a review before final implementation are put in place.

I also wonder if it will be more productive to consider alignment of DNO and TO/GBSO security standards at the interface, taking in to account expectations of customers, rather than implementing these proposed changes that are resource intensive.

In relation to the details of the proposed changes I have tried to expand SSE's views on each recommendation in the attached document.

Yours sincerely,

Chandra Trikha  
System Planning Manager  
SSE Power Distribution.



# SP Transmission & Distribution

Issued by email

Lilian MacLeod  
Regulatory Frameworks  
National Grid Electricity  
Transmission plc  
Warwick Technology Park  
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Your ref

Our ref **AM**

Date  
**16 April 2007**

Contact/Extension  
**01698 413466**

Dear Lilian

## **Grid Code Consultation Document "Improved Planning Code Date Exchange for Compliance Assessments" - reference B/07**

I am responding on behalf of SP Transmission and Distribution to the Grid Code Consultation Document "Improved Planning Code Date Exchange for Compliance Assessments" - reference B/07" issued on 15 March 2007. SP Transmission & Distribution is the licence holder for SP Transmission Limited, SP Distribution Limited and SP Manweb plc.

We have actively participated in the P2/5 Working Group and fully support the requirement for changes to the Grid Code to improve the clarity and sufficiency of information exchanged between National Grid and users.

It is important to note that the Working Group agreed to an approach that recognised (i) the need for the two-way exchange of data between National Grid and users and (ii) the benefits of a flexible approach for setting the maintenance period for Transmission Interface Circuits (TICs). We are therefore disappointed that the proposed legal Grid Code text changes do not fully reflect these principles agreed by the Working Group.

Our main points are set out below:

- The exchange of data should be a simple two-way process to provide sufficient data to ensure compliance. We recommend that this collaborative working approach should be reflected in the Grid Code text.
- The Grid Code text in the first part of PC.A.4.1.4.4 makes the user the compliance assessor for the TIC. This text should reflect that the System Operator in conjunction with the Transmission Owners should have responsibility for ensuring that each TIC is maintainable.

Members of the ScottishPower group

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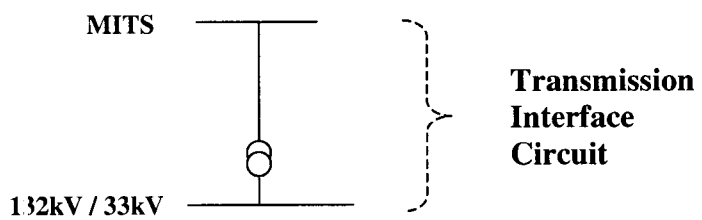
- Given that the TIC is outwith the control of a DNO and that load data aggregation and analysis is carried out and submitted at week 24, the requirement for a user, in advance of that work and by week 6, to submit proposed maintenance periods for all TICs is counter-intuitive and potentially problematic.
- More clarity is required on the definition of the TIC. The present definition is unclear and could be interpreted as covering either the infeed circuit, the infeed transformer only, or the entire circuit composition to the MITS. Given the objective of demonstrating maintainability of the Transmission Interface Circuits, we would propose that the definition of TIC must cover the full circuit from the connection point to the MITS (see the example in the appendix).
- National Grid was unable to provide the Working Group with information to support an absolute requirement for 8-week duration, 3-year maintenance cycle. While the objective is to assess TIC maintainability on a per-site basis in design timescales, from our own experience, we would expect that average duration of a planned outage for a TIC to be considerably less than 8-weeks. We therefore support an approach where the “Maintenance Period” of a TIC is reflective of the site-specific connectivity and is therefore defined to recognise that, although it typically will be 8 continuous weeks between weeks 13 and 43, it may not necessarily be 8-weeks and not necessarily be between week 13 to week 43.
- The increased data requirement will have a major impact on our workload. At this stage it is difficult to assess the precise impact. However, as a forecast, we expect this requirement to lead to a minimum of two additional FTEs i.e. one per DNO licence.

Yours sincerely,



**Alan Michie**  
Transmission Technical Manager

**Appendix**





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16 April 2007

Dear Lilian

### **Improved Planning Code Data Exchange for Compliance Assessment**

United Utilities is supportive of the need for greater clarity in determining SQSS and P2/6 compliance at the interface between DNOs and NGET.

It is clear that the proposals will deliver these aims with respect to the NGET compliance with GB SQSS. However, the proposals do not strengthen the ability of DNOs to assess P2/6 compliance and do not resolve the differences in compliance standards at the interface.

Although UU along with other DNOs believed that increased data clarity would go a long way to resolving differences of opinion about compliance at the interface, the Working Group output has now made us realize that the difference between the drafting of GB SQSS and P2/6 will probably make it very difficult to achieve the objective of resolving differences in relation to compliance status.

UU accepts the logic of the drafting of the Grid Code changes in achieving greater transparency of compliance, but we remain concerned that the data collation and exchange will expand our efforts in this area from about one third of a man year per year (for just 15 sites) to about a whole man year. Given the "theoretical" nature of any difficulties or risk of additional consumer disconnection for marginal non compliance, we really do wonder if these changes are appropriate, and believe that it is probably appropriate to confirm this with a Regulatory Impact Assessment, ie to establish that the benefit from improved compliance justifies the cost. We also wonder if it will not now be more productive to consider working to align DNO and TO security obligations at the interface. UU would rather expend more effort on establishing security requirements appropriate for the current times, particularly in urban areas, rather than the fairly sterile efforts of establishing compliance with a pair of standards that both have their roots in the 1970s.

In relation to the detail of the proposed changes:

- Responsibility for declaring the maintenance period – we are comfortable with having the obligation to declare the maintenance period. Irrespective of this responsibility, it is not practical at shared GSPs where there are two or more DNOs and where NGET own the bar. In this case the drafting of Transmission Interface Circuit does not work and none of the DNOs will have sufficient information (or rights) to pull together the initial view of Maintenance Periods.
- Rigidity of 8 week period – We recognize that eight weeks is a good starting assumption for relevant maintenance periods, we believe there is no direct link between SQSS and an 8 week period. Adopting a hard wired 8 weeks might not be the optimum approach.
- We believe there is asymmetry in the requirements for data provision – the legal drafting is biased against DNOs, in that data on NGET system conditions that affect our P2/6 compliance is only released on NGET's discretion.

In addition we are now concerned that the generation support implications of ER P2/6 are not reflected in GB SQSS making joint assessments of compliance even more problematic.

Yours sincerely,

Mike Kay  
Engineering & Planning Director  
United Utilities Electricity

**From:** Turvey, Nigel J. [mailto:nturvey@westernpower.co.uk]  
**Sent:** Thursday, April 05, 2007 8:44 AM  
**To:** Macleod, Lilian  
**Cc:** Berndes, Tony; Van Der Linde, Freddie  
**Subject:** Grid Code Consultation Response B/07 - Data

Dear Lilian,

Below are Western Power Distributions comments on Grid Code Consultation - B/07:  
Improved Planning Code Data Exchange for Compliance Assessments.

Please contact Tony Berndes by email at tberndes@westernpower.co.uk if you have any questions.

Regards

Nigel Turvey

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**WPD Consultation Comments**

1. The definition of the 8 week Maintenance Periods is very rigid:-
  - o It does not include a mechanism for resolving cases where there is disagreement about Maintenance Periods beyond the written submission of NGET to the DNOs in Week 17. At this point it appears that the DNOs will be under an obligation to accept NGET's statement of the Maintenance Periods or lack thereof. As this becomes a compliance issue, the process beyond Week 17 needs to be agreed.
  - o It is not linked to the GB SQSS or P2/6 and may lead to contrived compliance assessments that show circuits are in theory maintainable but will have time restrictions that will make the process irrelevant.
  - o It could lead to an unnecessary increase in the quantity and complexity of the data submitted where circuits can be maintained individually or concurrently throughout the entire Week 13 – 43 period.
2. Generally there appears to be a bias in the text to SQSS compliance. In some cases the requirement for P2/6 compliance is completely ignored (e.g. Section 6.2.2 in the Report) or it is assumed that P2/6 and SQSS compliance is assessed on the same basis (e.g. Average Conditions).
3. After conclusion of the Working Group activities, changes were made with respect to the use of the terms 'Maintenance Period' and 'Maintenance Slot', principally in the Report. This has led to ambiguous use of the term 'Maintenance Period' that requires revision.
  - It is still strongly felt that the term Maintenance Slot is inappropriate where it occurs in the legal text in PC.A.4.1.4.5. A less rigid definition of the term 'Maintenance Period' would eliminate its use altogether.
4. With respect to the Schedules:
  - o The rigid layout and labelling of Schedule 11 does not allow flexibility for considering different coincidence of loads in the future. This may be necessary as it was found during trials of the Schedules with NGET that the data required does not necessarily represent the worst case for the assessment of the system under ACS conditions.
  - o Schedule 11 does not allow embedded generation to be proportioned to more than one Connection Point in an unambiguous way.

Regards

Nigel

Nigel Turvey

Design & Development Manager

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