

**A REPORT TO THE AUTHORITY**

**Pursuant to Paragraph 2 of Condition C14 of the  
Transmission Licence.**

**Proposed Grid Code Modification  
Time Extension for the requirements of Grid Code  
General Conditions GC15**

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

Consultation Paper Ref	G/05
Issue	1
Date of Issue	2 September 2005
Prepared by	National Grid

DISTRIBUTION

Name	Organisation
Authority	Ofgem
Grid Code Review Panel Members	Various
National Grid Industry Information Website	

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. National Grid has just completed a review of the Grid Code. This review relates to changes to the Grid Code associated with an extension to the time limit encoded into Grid Code General Conditions GC.15.
3. The proposed changes to the Grid Code were discussed at the Extraordinary Grid Code Review Panel meeting on 20 July 2005 and National Grid explained its intention to issue a Consultation Paper.
4. National Grid, in accordance with its obligations under its Transmission Licence, consulted authorised electricity operators by including Consultation Paper G/05 on the National Grid Industry Information website on 2 August 2005. Consultation Paper G/05 contained an explanation of the proposed amendments to the Grid Code and a copy of Consultation Paper G/05 is attached to this Report as Appendix C. National Grid informed interested parties that a copy of the Consultation Paper had been placed on its website to ensure its wide availability.
5. Comments were invited from all such authorised electricity operators by 26 August 2005. National Grid has received responses from 4 authorised electricity operators.
6. The proposed revisions to the Grid Code are explained below.

#### Background

- 6.1 On 3<sup>rd</sup> March 2005 the Authority directed that Grid Code changes associated with requirements for Embedded Exemptable Large Power Stations should be implemented on 4<sup>th</sup> March 2005. At that time it was recognised that as the date for BETTA go live was imminent it would not be practical to expect all Users potentially affected by the changes to be able to comply with the Grid Code or even demonstrate compliance.
- 6.2 In addition, it was noted that National Grid would also be expected to review the size limits in the Grid Code relating to Small, Medium and Large Power Stations.

- 6.3 In light of the above Grid Code General Conditions (GC.15) was introduced that effectively allowed for National Grid to dis-apply parts of the Grid Code (with the Users agreement). This effectively enabled National Grid to issue temporary derogations.
- 6.4 A GCRP Working Group has now been initiated to review regional differences in the Grid Code, particularly in relation to the definitions of Small, Medium and Large Power Stations. If, as a result of this review, changes to the limits for Small, Medium and Large Power stations are recommended and approved, a significant number of Generators who now have to comply with the Grid Code may no longer need to comply. Given the associated current uncertainty National Grid feels that it is inappropriate that any plant that may not need to comply in the future as a result of the outcome of the review, should actually be required to comply until the review has concluded.
- 6.5 It is therefore proposed to extend the period stated in GC15 to 31<sup>st</sup> March 2007 to enable time for the review to be conducted in a considered manner and obviate the need for unnecessary expenditure by generators and National Grid. It should also be noted that as current Bilateral Agreements associated with EELPS specifically reference the 31<sup>st</sup> March 2006 date, these may need to be amended should these Grid Code change proposals be approved.

#### The Proposed Changes

- 6.6 It is proposed to amend GC.15.1 to extend the time limit from 31<sup>st</sup> March 2006 to 31<sup>st</sup> March 2007.
- 6.7 In addition it is proposed to take the opportunity to correct a typographical error in GC.15.1(a).
- 6.8 The proposed Grid Code changes are shown in Appendix A with deletions shown struck through and insertions highlighted by text in red and double underlined.

#### 7 Responses

- 7.1 National Grid received 4 responses to Consultation G/05.
- 7.2 All responses indicated that the proposed change either had no effect on them or were supportive of the proposed change. ScottishPower (SAIC) and E.ON also welcomed the proposed review of the Definitions of Small/Medium/Large Power Stations
- 7.3 One respondent (UU) noted that following the proposed introduction of Licence Exempt Embedded Medium Power Stations (LEEMPS) changes, they would expect it to be appropriate to extend GC15.1 to include Distribution Network Operators in respect of LEEMPS. Also it should be applicable to LEEMPS throughout GB, as opposed to Scotland as in the current wording. National Grid notes this response and has considered this issue in the LEEMPS Consultation (Consultation paper D/05)

- 7.4 One respondent (Magnox) suggested that given the proposed change had a neutral effect on Grid Code obligations this change should be implemented at an appropriate time along with other more substantial changes when approved. National Grid notes this suggestion and agrees that it would be helpful to combine implementation with any other changes that have been approved in similar timescales. However National Grid believes that if approved the changes should be implemented as soon as possible to avoid any unnecessary interaction with future Grid Code change proposals.
- 7.5 Copies of the responses received are included in Appendix B.
8. 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 C14 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 C14 of the Transmission Licence.
9. 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



**APPENDIX A**

**Proposed Grid Code changes detailed in Consultation Paper G/05**

EXTRACT FROM GRID CODE GENERAL CONDITIONS

(Based on Grid Code Issue 3 Revision 11)

GC.15 *Embedded Exemptable Large and Medium Power Stations*

GC.15.1 This GC.15.1 shall have an effect until and including 31<sup>st</sup> March ~~2006~~  
2007.

- (i) CC.6.3.2, CC.6.3.7, CC.8.1 and BC3.5.1; and
  - (ii) Planning Code obligations and other Connection Conditions;
- shall apply to a **User** who owns or operates
- (a) an **Embedded ~~Exemtable~~ Exemptable Large Power Station**, or
  - (b) an **Embedded Exemptable Medium Power Station** in Scotland

except where and to the extent that, in respect of that **Embedded Exemptable Large Power Station** or **Embedded Exemptable Medium Power Station**, **NGC** agrees or where the relevant **User** and **NGC** fail to agree, where and to the extent that the **Authority** consents.

**NOTE:** *If the changes associated with Consultation F/05 - Proposed changes to the Grid Code to incorporate the new Company Name – are approved before the changes proposed in this Report to the Authority, all references to 'NGC' will become 'NGET'.*

**APPENDIX B**

**Responses to Consultation Paper G/05**



**Payne, David - NGT House**

**From:** david.m.ward@magnox.co.uk  
**Sent:** 03 August 2005 11:01  
**To:** Payne, David - NGT House  
**Subject:** Grid Code Consultation Document G/05

To David Payne  
Industry Codes, Commercial Frameworks  
National Grid Company plc  
National Grid Transco House  
Warwick Technology Park  
Gallows Hill  
Warwick CV34 6DA

(By email)

**David**

Grid Code Consultation Document G/05

Time Extension for the requirements of Grid Code General Conditions GC15

This email is the formal response of Magnox Electric Ltd to the above consultation paper. Magnox Electric Ltd is part of the British Nuclear Group, which is the new name for part of BNFL. My comments are not confidential.

The proposal to extend the "Status Quo" for a year seems reasonable to me, bearing in mind that a working group still needs to consider the geographical variation in the definitions of small, medium and large, and perhaps propose changes which will impact on the area affected by GC15. This proposal has no effect on Magnox Electric Ltd.

May I suggest that as this change is "trivial" as it only affects one page, then it should be combined with one or more other changes when issuing an update to the Code. It would seem a little over-the-top to issue an update just for this change.

I hope my comments are helpful

Regards

David Ward

Magnox Electric Ltd  
Berkeley Centre  
Berkeley  
Gloucestershire, GL13 9PB  
United Kingdom

**Magnox Electric Ltd is a part of British Nuclear Group**

----- End of message



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Warrington WA5 3LW

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[www.unitedutilities.com](http://www.unitedutilities.com)

David Payne  
Industry Codes  
National Grid Electricity Transmission plc  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Direct line 01925 233303

[mkay@iee.org](mailto:mkay@iee.org)

08 August 2005

Dear David

**Grid Code Consultation Papers F/05 and G/05**

As might be expected we have no comments on F/05.

We also have no comments directly on G/05. However we notice that following the introduction of LEEMPS changes, we would expect it to be appropriate to extend GC15.1 to include DNOs in respect of LEEMPS and also that it should be applicable to LEEMPS throughout GB, as opposed to Scotland as in the current wording. We will, of course, make these comments again in the light of the LEEMPS consultation in due course.

Please contact me if you need any more information on these points.

Yours sincerely,

Mike Kay  
Chief Engineer  
Electricity Business Stream



David Payne  
Commercial Frameworks  
National Grid Company plc  
NGT House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Tuesday 16<sup>th</sup> August 2005

Dear David,

**G/05 – Time Extension for the requirements of GC15**

Thank you for the opportunity to respond to the above consultation. This response is on behalf of E.ON UK plc, E.ON UK CHP Ltd, Citigen (London) Limited, Enfield Energy Centre Limited and Cottam Development Centre Limited.

We welcome the review of Regional Differences in the Grid Code, and in the light of this review, we support the proposed change to GC15.

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

Yours sincerely

Claire Maxim  
Lead Contract Manager

**E.ON UK plc**  
Westwood Way  
Westwood Business Park  
Coventry  
CV4 8LG  
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**Science Applications  
International Corporation**  
*An Employee-Owned Company*

David Payne  
Industry Codes  
Commercial Frameworks  
National Grid Company plc  
National Grid Transco House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Ref GC G05  
Date 26 August 2005

Tel No. 01355845207  
Email: ukelectricityspoc@saic.com

Dear David,

**GC Consultation G05 - Time extension for the requirements of Grid Code General Conditions GC15 - Comments**

ScottishPower welcomes the opportunity to provide comment on the above consultation on the "Time extension for the requirements of Grid Code General Conditions GC15". This response is submitted on behalf of ScottishPower UK Division which includes the UK energy businesses of ScottishPower, namely ScottishPower Generation Ltd, ScottishPower Energy Management Ltd and ScottishPower Energy Retail Ltd.

ScottishPower agree that the size limits in the Grid Code relating to Small, Medium and Large Power Stations should be reviewed and that this time extension would enable the review to be conducted in a considered manner. This extension also obviates the need for any unnecessary expenditure (until this review is completed) relating to compliance work by generators (and National Grid). We therefore support this proposal.

I trust that you will find these comments helpful. Nonetheless, should you require further clarification of any of the above, please do not hesitate to contact me.

Yours sincerely,

Man Kwong Liu

SAIC Ltd.

For and on behalf of: - ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd;  
ScottishPower Energy Retail Ltd.

Consultation Paper G/05



**GRID CODE  
CONSULTATION DOCUMENT**

**Time Extension for the requirements of Grid Code  
General Conditions GC15**

**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**

Consultation Ref	<b>G/05</b>
Issue	1
Date of Issue	2 August 2005
<b>Responses required by</b>	<b>26 August 2005</b>
Prepared by	National Grid

## DOCUMENT LOCATION

National Grid website:

[http://www.nationalgridinfo.co.uk/grid\\_code/mn\\_consultation\\_papers.html](http://www.nationalgridinfo.co.uk/grid_code/mn_consultation_papers.html)

## DISTRIBUTION

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

A. Introduction

1. National Grid Electricity Transmission plc ("National Grid"), in accordance with its obligations under paragraph 2 of Condition C14 of the Transmission Licence, believes that the time has come to review, in consultation with authorised electricity operators liable to be materially affected thereby, the Grid Code and its implementation in certain respects.
2. This review is concerned with an extension to the time limit encoded into Grid Code General Conditions GC.15. The proposed changes to the Grid Code were discussed at the Extra Ordinary Grid Code Review Panel meeting held on 20<sup>th</sup> July 2005. At this stage, proposed revised text for Grid Code was presented, and following some further discussion it was agreed that a Consultation Paper would be issued.
3. Following receipt of comments from those authorised electricity operators which it has consulted by this Paper, National Grid intends, in accordance with paragraph 2 of Condition C14 of the Transmission Licence, to send to the Authority: -
  - (a) a report on the outcome of its review, including this consultation process;
  - (b) the proposed revisions to the Grid Code which National Grid (having regard to the outcome of such review) reasonably thinks fit for the achievement of the objectives of the Grid Code referred to in subparagraph (b) of paragraph 1 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.
4. The report will also be made publicly available on National Grid's website.
5. The revisions to the Grid Code proposed by National Grid and sent to the Authority then 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.

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## B. DESCRIPTION OF THE PROPOSED AMENDMENTS AND THEIR EFFECTS

### 6. Background

- 6.1 On 3<sup>rd</sup> March 2005 the Authority directed that Grid Code changes associated with requirements for Embedded Exemptable Large Power Stations should be implemented on 4<sup>th</sup> March 2005. At that time it was recognised that as the date for BETTA go live was imminent it would not be practical to expect all Users potentially affected by the changes to be able to comply with the Grid Code or even demonstrate compliance.
- 6.2 In addition, it was noted that National Grid would also be expected to review the size limits in the Grid Code relating to Small, Medium and Large Power Stations.
- 6.3 As a result it was decided to include a section in the Grid Code General Conditions (GC.15) that would effectively allow for National Grid to dis-apply parts of the Grid Code (with the Users agreement). This effectively enabled National Grid to issue temporary derogations.
- 6.4 A GCRP Working Group is to review the Grid Code regional differences, particularly in relation to the definitions of Small, Medium and Large Power Stations. If, as a result of this review, changes to the limits for Small, Medium and Large Power stations are recommended and approved, a significant number of Generators who now have to comply with the Grid Code may no longer need to comply. Given the associated current uncertainty National Grid feels that it is inappropriate that any plant that may not need to comply in the future as a result of the outcome of the review, should actually be required to comply until the review has concluded
- 6.5 It is therefore proposed to extend the period stated in GC15 to 31<sup>st</sup> March 2007 to enable time for the review to be conducted in a considered manner and obviate the need for unnecessary expenditure by generators and National Grid.
- 6.6 It should also be noted that as current Bilateral Agreements associated with EELPS specifically reference the 31<sup>st</sup> March 2006 date, these may need to be amended.

### 7. Proposed Changes

- 7.1 It is proposed to amend GC.15.1 to extend the time limit from 31<sup>st</sup> March 2006 to 31<sup>st</sup> March 2007.
- 7.2 In addition it is proposed to take the opportunity to correct a typographical error in GC.15.1(a).
- 7.3 The proposed Grid Code changes are shown in Appendix 1 with deletions shown struck through and insertions highlighted by text in red and double underlined.

C. COMMENTS

8. National Grid would be grateful to receive your comments on, or any suggestions you may have in relation to, these proposed amendments to the Grid Code. Comments would be welcomed and should be sent to National Grid by **26 August 2005**. The comments will be reviewed and responded to and National Grid will then prepare its report to the Authority.
9. Unless otherwise marked as confidential any responses containing objections to the proposals which are maintained will be published on our website in the copy of the Report to the Authority referred to in paragraphs 3 and 4.
10. Your formal responses may be: -

Posted to: David Payne  
Industry Codes  
Commercial Frameworks  
National Grid Electricity Transmission plc  
National Grid Transco House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Emailed to: [david.payne@ngtuk.com](mailto:david.payne@ngtuk.com)

## **APPENDIX 1**

### **EXTRACT FROM GRID CODE GENERAL CONDITIONS** (Based on Grid Code Issue 3 Revision 1)

GC.15 *Embedded Exemptable Large and Medium Power Stations*

GC.15.1 This GC.15.1 shall have an effect until and including 31<sup>st</sup> March ~~2006~~  
2007.

- (i) CC.6.3.2, CC.6.3.7, CC.8.1 and BC3.5.1; and
- (ii) Planning Code obligations and other Connection Conditions;

shall apply to a **User** who owns or operates

- (a) an **Embedded ~~Exemtable~~ Exemptable Large Power Station**, or
- (b) an **Embedded Exemptable Medium Power Station** in Scotland

except where and to the extent that, in respect of that **Embedded Exemptable Large Power Station** or **Embedded Exemptable Medium Power Station**, **NGC** agrees or where the relevant **User** and **NGC** fail to agree, where and to the extent that the **Authority** consents.