

What stage is this document in the process?

Stage 01: Proposal

CAP189 Standard Gas Insulated Switchgear Ownership Boundaries

- ▶ 01 Initial Written Assessment
- 02 Definition Procedure
- 03 Assessment Procedure
- 04 Report Phase

The proposal seeks to modify the CUSC in order for a User requesting a connection to the National Electricity Transmission System via a GIS substation will be able to elect between two standard ownership boundaries.



The *Code Administrator* recommends:
CAP189 proceeds to Working Group



High Impact:
Transmission Owners, Generators, DNOs and Directly Connected Customers



Medium Impact:
None anticipated

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Any questions?

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Proposer:

Tom Ireland

About this document:

This document is an Initial Written Assessment to support CAP189 which will be presented by the Proposer to the Amendments Panel on 30 July 2010. The Panel will consider the Proposer's recommendation, and agree whether this Proposal should proceed to consultation or be referred to a Working Group for development.

Further information is available in the Amendment Proposal which is an appendix to this document. The Proposed CAP189 Terms of Reference are also included as an Appendix to this document. For reference the GIS Working Group Report is contained as an appendix to this document to provide further background.

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What is GIS?

Gas Insulated Switchgear (GSI) is where the conductors and contacts are insulated by pressurised sulphur hexafluoride gas. A GIS Substation is generally used to connect transmission circuits to generators, DNs or other transmission circuits. It provides protection and control to the network and is often used in urban, coastal and high pollution areas. A Standard substation with Air Insulated Switchgear (AIS) uses a large air gap to insulate the live conductors from the ground.

1 Why Change?

CAP189 results from a recommendation of the joint Grid Code / CUSC Gas Insulated Switchgear (GIS) Working Group. The Working Group sought to clarify issues identified which related to GIS assets, specifically the construction, operation and maintenance of User owned assets.

The current standard ownership boundary cannot be applied to new GIS connections as a result of changes to asset designs. Consequently, ownership boundaries are determined and specified on a site by site project specific basis leading to additional construction and operational process complexity.

There is no recognised international standard for compatibility between GIS equipment manufactured by different GIS manufacturers which has a direct impact upon competition for the procurement and maintenance of the User's GIS bay equipment. It is not feasible to interface together GIS equipment from different manufacturers.

The GIS Working Group concluded that there is currently a limited amount of competition for construction of GIS bays since Users only have the choice of constructing the GIS bays themselves or, in the case of a generation connection, asking National Grid to do this via the Alliance Partners as unlicensed work. The Working Group noted that if the user chose to construct the GIS bay itself, they would need to contract with the same manufacturer directly. As indicated above, the use of another manufacturer's GIS equipment is not feasible.

2 Solution

CAP189 seeks to change the CUSC in order to enable a User that is requesting a connection to the National Electricity Transmission System via a GIS substation to be able to elect one of the following standard ownership boundaries and construction options:

1. Generator Standard Boundary
2. DNO Standard Boundary – User builds all the GIS assets
3. DNO Standard Boundary –User builds their own assets only

The Proposal will allow any User to choose either boundary.

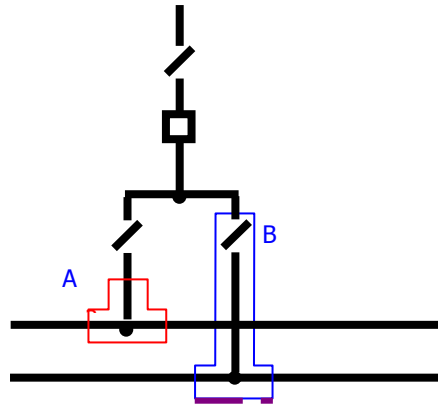
The Generator Standard Boundary is the boundary at which generators will typically elect to connect. The DNO Standard Boundary is the boundary at which DNO's will typically select, as currently defined in CUSC 2.12.1 (e) (ii) which may result in the busbars of the GIS substation being owned by multiple parties. At GIS Switchboards where a single DNO interfaces with a Transmission Owner, the boundary would be where the Transmission Owner connects to the DNO assets.

The principle would be maintained that the electrical boundary is at the same point as the ownership boundary, therefore overall ownership and control of generator bay will move to the Transmission Owner under the Generator Standard Boundary.

GIS installations can be classified into two types:

Type A GIS: Switchgear where the bus selector disconnectors are not in the same gas zone as the busbars (i.e. where there are gas zone separators between the bus selector disconnectors and the busbars). This type is no longer available from manufacturers.

Type B GIS: Switchgear where the bus selector disconnectors are in the same gas zone as the busbars.



Under the Generator Standard Boundary the Transmission Owner would construct all the GIS assets. The GIS Working Group concluded that there are two effective options for the construction of GIS assets under the DNO Standard Boundary arrangement:

1. The responsibility for the construction of the bay remains with the User and they have the choice to contract with National Grid Electricity Transmission plc's unlicensed business or any other party to install the User bay and therefore maintaining the ability for competition in construction.
2. A self build arrangement under which the majority GIS asset owner would construct all the GIS assets on site and on completion the relevant assets would be transferred to the other party such that the enduring ownership boundary is at the DNO Standard Boundary. The majority GIS asset owner could be either the Transmission Owner or the User.

The Proposed Generator Standard Boundary is currently available as a non-standard ownership boundary; this proposal effectively codifies this arrangement as a standard form.

Changes to the CUSC are required as follows:

- Section 2: Connection
- Section 11: Definitions
- Standard Exhibit B: the Connection Application Form

3 Proposed Progression

The Proposer recommends that CAP189 proceed to a Working Group for future development.

The Code Administrator proposes the following timescales for progressing CAP189

30 th July 2010	CUSC Panel Meeting – agree Working Group Terms of Reference (see draft TOR as Appendix 2 to this IWA)
W/C 9 th August 2010	First Working Group meeting
26 th August 2010	Second Working Group Meeting
3 rd September 2010	Draft Working Group Consultation for comment
10 th September 2010	Publish Working Group consultation (for two weeks)
24 th September 2010	Deadline for responses on Working Group report
30 th September 2010	Post-consultation Working Group meeting (to review consultation responses, confirm any alternatives and undertake Working Group vote)
7 th October 2010	Draft Working Group Report circulated for comment
14 th October 2010	Deadline for comment on Working Group report
21 st October 2010	Publish final Working Group report for Panel Papers
29 th October 2010	Present Working Group report to Amendments Panel
2 nd November 2010	Issue industry consultations (2 weeks)
16 th November 2010	Deadline for industry comment
17 th November 2010	Draft Amendment Report published for industry consultation
24 th November 2010	Deadline for industry comment
26 th November 2010	Amendments Panel Meeting – Panel Recommendation Vote
3 rd December 2010	Send final Amendment Report to Authority
12 th January 2011	Indicative Authority decision (25 Working Day KPI)
26 th January 2010	Indicative implementation date (10 Working Days after decision)

4 Impacts & Costs

Estimated Costs of Progressing Amendment Proposal

Estimated code administration costs based on proposed timetable	
Resource costs	£5445 - 3 Working Group meetings £60 - Catering
Total Code Administrator costs	£5505

The costs above are estimates and assume:

- 3 Working Group meetings held at National Grid offices for which there are no room costs.
- Working Group Chairman and Technical Secretary provided by National Grid.
- Resource costs are based on National Grid's "Charge-Out Rates", published in Schedule 3 of The Statement of Use of System Charges, on National Grid's website at:
<http://www.nationalgrid.com/uk/Electricity/Charges/chargingstatementsapproval/index.htm>;

- The published rates include overheads.

Indicative industry costs

Resource costs	£8167 - 3 Working Group meetings £18,170 - 2 Consultations
Total Industry Costs	£26,337

Impact on Core Industry Documents and other documents

None identified

5 The Case for Change

The Proposer believes that CAP189 would better meet both Applicable CUSC Objectives:

- (a) the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this license;

National Grid has a range of statutory duties and licence obligations which include ensuring the efficient, economic and co-ordinated operation of the National Electricity Transmission System. The proposed amendment better facilitates objective (a) the efficient discharge by transmission licensees of this obligation as site specific construction and operational procedures and contractual arrangements would no longer be inherently required for connections at GIS substations.

- (b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

With regard to objective (b), implementation of CAP189 would establish enhanced competition in the construction, operation and maintenance of User owned GIS assets and therefore facilitate Transmission Owners, Generators, DNOs and directly connected users connecting at a GIS substation, in the future.

6 Recommendation

The Proposer recommends that:

- This CUSC Amendment Proposal proceeds to a Working Group

The Code Administrator recommends that:

- The timetable set out within this IWA is adopted to progress the Amendment Proposal.

CUSC Amendment Proposal Form	CAP: 189
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Title of Amendment Proposal:

Standard Gas Insulated Switchgear Ownership Boundaries

Description of the Proposed Amendment (*mandatory by proposer*):

CAP189 is raised following a recommendation of the joint Grid Code/ CUSC Gas Insulated Switchgear Working Group, whose report was presented to the May 2010 CUSC Amendments Panel meeting. The Working Group sought to clarify a number of issues identified relating to Gas Insulated Switchgear (GIS) assets. CAP189 specifically seeks to modify the CUSC such that a User requesting a connection to the National Electricity Transmission System, via a GIS substation, will be able to elect one of the following standard ownership boundaries and construction options:

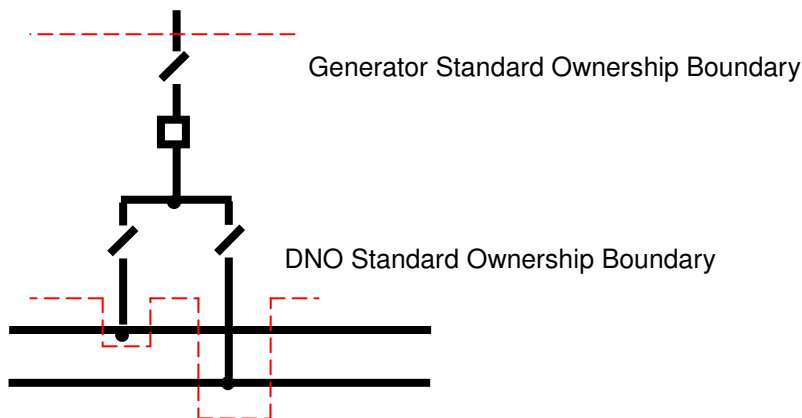
1. Generator Standard Boundary
2. DNO Standard Boundary – User builds all the GIS assets
3. DNO Standard Boundary – User builds their own assets only

The boundary description is intended to reflect the boundary that Generator and DNO Users would typically choose, but the recommendation will allow any User to choose either boundary.

The Generator Standard Boundary is the boundary at which Generators will typically elect to connect and the Working Group concluded this should be at the interface between the cable box socket and plug on the Users' circuit, as shown in the diagram below. The commercial terms in relation to Interruption Payments of a connection at such a boundary will be consistent with those currently made within the Scottish Power Transmission Region, namely that Interruption Payments are not made for loss of access resulting from faults or maintenance on the generator GIS bay.

The DNO Standard Boundary is the boundary which DNOs will typically select, based on the current definition in CUSC 2.12.1(e)(ii) which will result in the busbars of the GIS assets being owned by multiple parties. At GIS switchboards, where a single DNO interfaces with a Transmission Owner (TO) the boundary would be that at which the TO connects to the DNO assets.

For the avoidance of doubt, Generators will be free to select the DNO Standard Boundary and vice versa.



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The proposed Generator Standard Boundary is currently available as a non-standard ownership boundary; the proposal effectively codifies this arrangement as a standard form.

The principle would be maintained that the electrical boundary is at the same point as the ownership boundary. Consequently, overall ownership and control of the generator bay will move to the Transmission Owner under the Generator Standard Boundary, although the Generator (or DNO) will be able to operate the bay circuit breaker on the basis of switching agreements as recorded in the

Options for Construction

Under the Generator Standard Boundary, the TO would construct all the GIS assets.

The GIS Working Group concluded that there are two effective options for the construction of GIS assets under the DNO Standard Boundary arrangement. The first is where the responsibility for the construction of the bay remains with the User. In this option the User has the choice to contract either with National Grid's unlicensed business or any other party (in reality limited to the GIS manufacturer) to install the User bay, thus, maintaining the ability for competition in construction. The second option is a self build arrangement under which the majority GIS asset owner would construct all the GIS assets on site and on completion the relevant assets would be transferred to the other party such that the enduring ownership boundary is at the DNO Standard Boundary. The majority GIS asset owner could be either the TO or the User.

The Connection Application Form within the CUSC would be amended to allow a User to nominate which standard ownership boundary and construction approach would be preferred if the use of GIS technology were required.

Description of Issue or Defect that Proposed Amendment seeks to Address (*mandatory by proposer*):

Within the CUSC, the existing standard ownership boundary for GIS assets cannot be applied to the currently available GIS assets. Ownership boundaries are therefore determined and specified on a site by site project specific basis. Due to the nature of GIS equipment (i.e. integrated, sealed and modular) it is difficult to identify a construction and on going operational ownership boundary for all User connections at GIS substations. Site specific arrangements lead to construction and operational procedural complexity.

There is no recognised international standard for compatibility between GIS equipment manufactured by different GIS manufacturers which has a direct impact upon competition for the procurement and maintenance of the User's GIS bay equipment. It is not feasible to interface together GIS equipment from different manufacturers.

The GIS Working Group concluded that there is currently a limited amount of competition for construction of GIS bays since Users only have the choice of constructing the GIS bays themselves or, in the case of a generation connection, asking National Grid to do this via the Alliance Partners as unlicensed work. The Working Group noted that if the user chose to construct the GIS bay itself, they would need to contract with the same manufacturer directly. As indicated above, the use of another manufacturer's GIS equipment is not feasible.

The Working Group concluded that competition in the maintenance of User GIS bays is limited with inherent complexities to gain market entry including access to transmission substations, safety management and the specialised nature and equipment required and therefore a significant proportion of such maintenance is performed by National Grid's unlicensed business. That withstanding, the Working Group concluded that alternative service providers have been developing such capability and resources levels in order to partake in the maintenance of GIS transmission assets, and therefore the effectiveness of competition will increase.

Impact on the CUSC (*this should be given where possible*):

Changes are proposed to the following sections of the CUSC:

- Section 2: Connection

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- Section 11: Definitions
- Standard Exhibit F for the Connection Application Form

Impact on Core Industry Documentation *(this should be given where possible):*

There are no impacts identified from CAP189 on Core Industry Documentation.

Impact on Computer Systems and Processes used by CUSC Parties *(this should be given where possible):*

None identified

Details of any Related Modifications to Other Industry Codes *(where known):*

None identified

Justification for Proposed Amendment with Reference to Applicable CUSC Objectives** ***(mandatory by proposer):***

The Proposed Amendment would better meet both Applicable CUSC Objectives:

(c) the efficient discharge by the licensee of the obligations imposed upon it under the Act and by this license;

National Grid has a range of statutory duties and licence obligations which include ensuring the efficient, economic and co-ordinated operation of the National Electricity Transmission System. The proposed amendment better facilitates objective (a) the efficient discharge by transmission licensees of this obligation as site specific construction and operational procedures and contractual arrangements would no longer be inherently required for connections at GIS substations.

(d) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

With regard to objective (b), implementation of CAP189 would further facilitate competition in the construction, operation and maintenance of User owned GIS assets and therefore facilitates Transmission Owners, Generators, DNOs and directly connected users connecting at a GIS substation, in the future.

Details of Proposer: Organisation's Name:	National Grid Electricity Transmission plc
Capacity in which the Amendment is being proposed: (i.e. CUSC Party, BSC Party or "National Consumer Council")	CUSC Party
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Tom Ireland National Grid Electricity Transmission 01926 65 6152 Thomas.ireland@uk.ngrid.com
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	David Smith National Grid Electricity Transmission 01926 65 5534 David.m.smith@uk.ngrid.com
Attachments (Yes/No): Yes If Yes, Title and No. of pages of each Attachment: The latest version of the Gas Insulated Switchgear Working Group Report is available on National Grid's website at: http://www.nationalgrid.com/NR/rdonlyres/FED4D50E-4469-4D7F-B08F-F08DE47C0800/41152/GasInsulatedSwitchgearWorkingGroupReport.pdf	

Notes:

1. Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.
2. The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.

The completed form should be returned to:

Bali Virk

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Commercial
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Or via e-mail to: Bali.Virk@uk.ngrid.com

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

3. Applicable CUSC Objectives** - These are defined within the National Grid Electricity Transmission plc Licence under Standard Condition C10, paragraph 1. Reference should be made to this section when considering a proposed amendment.

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TERMS OF REFERENCE FOR CAP189 WORKING GROUP

RESPONSIBILITIES

1. The Working Group is responsible for assisting the CUSC Amendments Panel in the evaluation of CUSC Amendment Proposal CAP189 Standard Gas Insulated Switchgear Ownership Boundaries tabled by Tom Ireland at the Amendments Panel meeting on 30th July 2010
2. The proposal must be evaluated to consider whether it better facilitates achievement of the Applicable CUSC Objectives. These can be summarised as follows:
 - (a) the efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence; and
 - (b) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.
3. It should be noted that additional provisions apply where it is proposed to modify the CUSC amendment provisions, and generally reference should be made to the Transmission Licence for the full definition of the term.

SCOPE OF WORK

4. The Working Group must consider the issues raised by the Amendment Proposal and consider if the proposal identified better facilitates achievement of the Applicable CUSC Objectives.
5. In addition to the overriding requirement of paragraph 4, the Working Group shall consider and report on the following specific issues:
 - a) Review the Illustrative Legal text
 - b) Consider any Alternative Amendments
6. The Working Group is responsible for the formulation and evaluation of any Working Group Alternative Amendments (WGAAs) arising from Group discussions which would, as compared with the Amendment Proposal or the current version of the CUSC, better facilitate achieving the Applicable CUSC Objectives in relation to the issue or defect identified.
7. The Working Group should become conversant with the definition of Working Group Alternative Amendment which appears in Section 11 (Interpretation and Definitions) of the CUSC. The definition entitles the Group and/or an individual member of the Working Group to put forward a WGAA if the member(s) genuinely believes the WGAA would better facilitate the achievement of the Applicable CUSC Objectives, as compared with the Amendment Proposal or the current version of the

CUSC. The extent of the support for the Amendment Proposal or any WGAA arising from the Working Group's discussions should be clearly described in the final Working Group Report to the CUSC Amendments Panel.

8. Working Group members should be mindful of efficiency and propose the fewest number of WGAA's possible.
9. All proposed WGAA's should include the Proposer(s)'s details within the final Working Group report, for the avoidance of doubt this includes WGAA's which are proposed by the entire Working Group or subset of members.
10. There is an obligation on the Working Group to undertake a period of Consultation in accordance with CUSC 8.17. The Working Group Consultation period shall be for a period of [####] as determined by the Amendments Panel.
11. Following the Consultation period the Working Group is required to consider all responses including any WG Consultation Alternative Requests. In undertaking an assessment of any WG Consultation Alternative Request, the Working Group should consider whether it better facilitates the Applicable CUSC Objectives than the current version of the CUSC.

As appropriate, the Working Group will be required to undertake any further analysis and update the original Amendment Proposal and/or WGAA's. All responses including any WG Consultation Alternative Requests shall be included within the final report including a summary of the Working Group's deliberations and conclusions. The report should make it clear where and why the Working Group chairman has exercised his right under the CUSC to progress a WG Consultation Alternative Request or a WGAA against the majority views of Working Group members. It should also be explicitly stated where, under these circumstances, the Working Group chairman is employed by the same organisation who submitted the WG Consultation Alternative Request.

12. The Working Group is to submit its final report to the Amendments Panel Secretary on 29th October 2010 for circulation to Panel Members. The final report conclusions will be presented to the Amendments Panel meeting on 26th November 2010

MEMBERSHIP

13. It is recommended that the Working Group has the following members: *[to be updated once membership is established to reflect the actual membership]*

Role	Name	Representing
<i>Chairman</i>		
<i>National Grid Representative*</i>		
<i>Industry Representatives*</i>	<i>Generator Representative</i>	

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	<i>Transmission Owner Representative</i>	
	<i>DNO Representative</i>	
	<i>Directly Connected Customer Representative</i>	
<i>Authority Representative</i>		
<i>Technical Secretary</i>	<i>[normally provided by National Grid]</i>	
<i>Observers</i>		

NB: A Working Group must comprise at least 5 members (who may be Panel Members). The roles identified with an asterisk in the table above contribute toward the required quorum, determined in accordance with paragraph 14 below.

14. The chairman of the Working Group and the Amendments Panel Chairman must agree a number that will be quorum for each Working Group meeting. The agreed figure for CAP189 is that at least *###* Working Group members must participate in a meeting for quorum to be met.
15. A vote is to take place by all eligible Working Group members on the Amendment Proposal and each WGAA. The vote shall be decided by simple majority of those present at the meeting at which the vote takes place (whether in person or by teleconference). The Working Group chairman shall not have a vote, casting or otherwise]. There may be up to three rounds of voting, as follows:
 - Vote 1: whether each proposal better facilitates the Applicable CUSC Objectives;
 - Vote 2: where one or more WGAA exist, whether each WGAA better facilitates the Applicable CUSC Objectives than the original Amendment Proposal;
 - Vote 3: which option is considered to BEST facilitate achievement of the Applicable CUSC Objectives. For the avoidance of doubt, this vote should include the existing CUSC baseline as an option.

The results from the vote [and the reasons for such voting] shall be recorded in the Working Group report [in as much detail as practicable].

16. It is expected that Working Group members would only abstain from voting under limited circumstances, for example where a member feels that a proposal has been insufficiently developed. Where a member has such concerns, they should raise these with the Working Group chairman at the earliest possible opportunity and certainly before the Working Group vote takes place. Where abstention occurs, the reason should be recorded in the Working Group report.
17. Working Group members or their appointed alternate are required to attend a minimum of 50% of the Working Group meetings to be eligible to participate in the Working Group vote.
18. The Technical Secretary shall keep an Attendance Record for the Working Group meetings and circulate the Attendance Record with the Action Notes after each meeting. This will be attached to the final Working Group report.

19. The Working Group membership can be amended from time to time by the CUSC Amendments Panel.

RELATIONSHIP WITH AMENDMENTS PANEL

20. The Working Group shall seek the views of the Amendments Panel before taking on any significant amount of work. In this event the Working Group chairman should contact the Amendments Panel Secretary.
21. The Working Group shall seek the Amendments Panel's advice if a significant issue is raised during the Consultation process which would require a second period of Consultation in accordance with 8.17.17 of the CUSC.
22. Where the Working Group requires instruction, clarification or guidance from the Amendments Panel, particularly in relation to their Scope of Work, the Working Group chairman should contact the Amendments Panel Secretary.

MEETINGS

23. The Working Group shall, unless determined otherwise by the Amendments Panel, develop and adopt its own internal working procedures and provide a copy to the Panel Secretary for each of its Amendment Proposals.

REPORTING

24. The Working Group chairman shall prepare a final report to the 26th November 2010 Amendments Panel responding to the matters set out in the Terms of Reference, including all Working Group Consultation Responses and Alternative Requests.
25. A draft Working Group Report must be circulated to Working Group members with not less than five Business Days given for comments, unless all Working Group members agree to three Business Days.
26. Any unresolved comments within the Working Group must be reflected in the final Working Group Report.
27. The chairman (or another member nominated by him) will present the Working Group report to the Amendments Panel as required.

30 th July 2010	CUSC Panel Meeting – agree Working Group Terms of Reference
W/C 9 th August 2010	First Working Group meeting
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