GRID CODE

CONSULTATION DOCUMENT

Proposed Grid Code Modifications to Incorporate New Provisions Relating to the Flow of Information on Mothballed Plant and Alternative Fuels

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

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Prepared by	National Grid

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National Grid website:

http://www.nationalgridinfo.co.uk/grid_code/mn_consultation_papers.html

DISTRIBUTION

Name	Organisation
AEOs	Various
GCRP Members/Alternates	Various
Interested Parties	Various
National Grid Industry Information Website	

A. Introduction

1. National Grid Company plc ("National Grid"), in accordance with its obligations under paragraph 2 of Condition 7 of the Transmission Licence, believes that it is appropriate to review, in consultation with authorised electricity operators liable to be materially affected thereby, the Grid Code and its implementation in certain respects.

2. National Grid has been requested by Ofgem to consider changes to the Grid Code in response to a number of information gaps identified by the DTI/Ofgem Joint Energy Security of Supply working group (JESS) as listed below. Therefore, this review is concerned with identifying the changes needed in order to facilitate a mechanism for Generators to provide to National Grid information relating to:

   (a) the estimated return to service times of mothballed Generating Units; and

   (b) the capability of gas-fired Generating Units to operate using alternative fuels, such as oil distillate, alternative gas supply, etc.

   The proposed changes to the Grid Code were discussed at the Grid Code Review Panel meeting held on 20 November 2003 where National Grid informed Panel Members that it intended to consult on these changes.

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 7 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 sub-paragraph (b) of paragraph 1 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.

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.

B. DESCRIPTION OF THE PROPOSED AMENDMENTS AND THEIR EFFECTS

6. Background

6.1 In its second report published in May 2003 JESS identified a number of gaps in the information provided to it, including in particular information on mothballed plant and alternative fuels for gas-fired power stations.

6.2 Each year Ofgem requests National Grid to provide information on available generating capacity for the forthcoming winter. This is presented to Ofgem in a Winter Operations Report, which is subsequently published on the Ofgem web site.

6.3 When preparing any assessment of available generating capacity, however, it is not possible to take account of plant that might be able to either return to service from a mothballed state or switch to an alternative fuel, as the relevant information is not currently provided to National Grid.

6.4 Following on from the second JESS report Ofgem requested National Grid to undertake collection of this data for Winter 03/04 for inclusion in the 2003 Winter Operations Report and to consider appropriate changes to the Grid Code in order to formalise the collection of this data in future years. National Grid agreed to both requests and wrote to the Generators in respect of the information for Winter 03/04, which has been provided.

6.5 Following the presentation of a paper by National Grid to the Grid Code Review Panel in September 2003 it was agreed to establish the Mothballed Plant & Alternative Fuels (MPAF) Working Group to consider the issues. The Working Group included representatives nominated by Generators and by National Grid. Ofgem was present as an observer and a representative of the DTI attended the second meeting.

6.6 The Working Group reported to the November 2003 meeting proposing detailed drafting changes for the Grid Code.

7. Proposed Changes

7.1 The proposal is for information on mothballed plant and alternative fuel information to be supplied by Generators to National Grid as part of the Planning Code Week 24 submissions, and also at National Grid's reasonable request.

7.2 It is proposed to introduce a new definition for 'Mothballed Generating Unit' in order to minimise the potential for misinterpretation. This intentionally avoids any reference to other data submissions, such as OC2 data in order to avoid the risk of them being skewed.

7.3 On the estimated return-to-service time for mothballed plant the Working Group agreed that this should be the time required to carry out the necessary technical work to make plant fit for service using Good Industry Practice, reflecting normal working arrangements and procurement lead times. This is consistent with other Grid Code approaches and enhances the likelihood of obtaining consistent data from different generators. Any acceleration of a plant's return would be at the discretion of the Generator, possibly reflecting the prevailing commercial environment.

7.4 It should be noted that the Planning Code requires updates to Week 24 data to be submitted in the event of any changes occurring between annual submissions.

7.5 The draft text for the Planning Code includes a new section PC.A.5.X after section PC.A.5.4. The numbering has been shown in this way because the work of the Generic Provisions Working Group (Consultation D/03) also proposes a new section in the same place. If these proposals were to be introduced before a decision on the Generic Provisions proposals then the numbering should be PC.A.5.5. Otherwise, the numbering would need to take account of the additional Generic Provisions text.

8. Additional Issues

8.1 At the November 2003 GCRP meeting, National Grid raised a number of additional issues for discussion. Panel members and Working Group members have had the opportunity to comment on them, but no comments or suggestions have been received. Therefore, National Grid has considered how these issues can be addressed and revised the draft text accordingly. The issues raised were:

- The provision of information about the reverse changeover from alternative fuel back to main fuel. This has been included in the revised draft text.

- The appropriate schedule in the Data Registration Code for mothballed plant and alternative fuel information. The revised proposal is to include a new schedule 15 rather than adding the information to schedule 1 as originally proposed. This also requires changes to DRC 6.1 and 6.2.

- The month & year of last successful changeover originally proposed in the alternative fuel information would need to be updated under the existing PC.A.1.2(b) every time a change-over was carried out. To avoid imposing this administrative burden on Generators it is now proposed that they identify for each alternative fuel:

  (a) whether changeovers are carried out as part of normal operating arrangements;

  (b) the number of successful changeovers that were carried out in the last NGC Financial Year from a selection of 0, 1-5, 6-10, 11-20 and >20.

8.2 Ofgem also commented at the November GCRP on the use of information by National Grid. This is covered in more detail in section 9 below and the proposed text has been amended accordingly.

9. Use of Information

9.1 At the Working Group Generators expressed their concerns about the use of information by National Grid, Ofgem and the DTI. The Ofgem and DTI representatives noted the Generators' concerns and they were taken into account in developing the proposals. This section explains how the information might be used.

9.2 The information provided to National Grid will be used in preparing reports to Ofgem and the DTI. Where these reports are known by National Grid to be for wider circulation the data will be suitably aggregated to protect commercial confidentiality. The Working Group accepted the formats used in the 2003 Winter Operations Report as being useful examples of such aggregation.

9.3 However, National Grid might be required to provide disaggregated information to Ofgem and the DTI. Generators may want to consider their own position regarding Ofgem's powers with respect to this information and may wish to discuss this directly with Ofgem and the DTI.

9.4 In attempting to address the Generators' concerns the paper to the November 2003 GCRP suggested that National Grid should not use the aggregated information publicly, such as at its Operational Forum, until after any reports provided by National Grid had been published by Ofgem. Ofgem stated their view at the GCRP meeting that the publication of aggregated data by National Grid should not be restricted in this way. Furthermore, the original letter from Ofgem to National Grid did not imply that such a restriction was necessary and the consultation ought to consider whether National Grid should be permitted to publish aggregated information at Ofgem's request.

9.5 Existing data flows under the Grid Code already provide National Grid with information about the long-term availability of generation plant. These include Registered Capacity provided under the Planning Code together with Output Usable and generation outages under Operating Code 2 (OC2). Data is aggregated and used in the provision of reports on the Balancing Mechanism Reporting Service (Surplus) and the Elexon web site (Output Usable and Generating Plant Demand Margin).

9.6 Data received pursuant to the Grid Code is subject to the usual contractual and regulatory safeguards contained in amongst other documents the CUSC and Transmission Licence. For example the CUSC prescribes that data provided under the Grid Code is treated as protected information and details how such data must be protected and used. Also, the relevant confidentiality safeguards ensure the protection of data provided under the Grid Code for purposes defined in for example the CUSC or Transmission Licence. The additional data proposed to be collected is similar in terms of sensitivity to other data collected under the Grid Code, for example OC2 data, and will receive similar protection. National Grid can only use the data as permitted in accordance with the contractual and regulatory framework already in place.

9.7 The GCRP asked for examples of the ways in which National Grid might use this information.

- Aggregated data on estimated return-to-service times of mothballed plant might be used to consider theoretical plant margins covering different scenarios of mothballed plant returning. However, it should be noted that National Grid is not party to the drivers or processes by which Generators make such commercial decisions and any such analysis would be purely hypothetical.

- Data on the frequency of successful changeovers to alternative fuels might contribute to the analysis of operating reserve holding requirements.

C. COMMENTS

10. 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 **20 January 2004**. The comments will be reviewed and responded to and National Grid will then prepare its report to the Authority.

11. Comments would also be welcomed on the suggestion made by Ofgem at the November GCRP that National Grid should be able to publish the aggregated data provided under these proposals at Ofgem's request.

12. Unless otherwise marked as confidential all responses to the proposals will be published on our website. In addition, any responses containing maintained

objections to the proposals will be published, unless otherwise marked as confidential, in the copy of the Report to the Authority referred to in paragraphs 3 and 4.

13. Your formal responses may be:-

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

Emailed to: david.payne@ngtuk.com

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Appendix 1

Proposed draft indicative changes to the Grid Code to enable provision of Mothballed Plant and Alternative Fuel information

The following sets out indicative changes required to the Grid Code to facilitate the collection by National Grid of information on the return to service times of mothballed plant and the capability of gas-fired plant to run using alternative fuels.

All changes are in red text with deletions struck out and insertions underlined.

Glossary and Definitions

Insert new definition:

Mothballed Generating Unit	A **Generating Unit** that has previously generated which the **Generator** plans not to use to generate for the remainder of the current **NGC Financial Year** but which could be returned to service.

Planning Code

The following indicative changes are proposed to the Planning Code.

OBJECTIVE

PC2.1 (b) to provide for the supply of information required by **NGC** from **Users** in order for **NGC** to undertake the planning and development of the **NGC Transmission System** in accordance with the relevant **Licence Standards**, to facilitate existing and proposed connections, and also to provide for the supply of certain information from **NGC** to **Users** in relation to short circuit current contributions; ~~and~~

(c) to specify the **Licence Standards** which will be used by **NGC** in the planning and development of the **NGC Transmission System**; and~~.~~

(d) to provide for the supply of information required by **NGC** from **Users** in respect of the following to enable **NGC** to carry out its duties under the **Act** and the **Transmission Licence:**

(i) **Mothballed Generating Units**; and

(ii) capability of gas-fired **Generating Units** to run using alternative fuels.

NGC will use the information in providing reports relating to it to the **Authority** and the **Secretary of State**. Where it is known by **NGC** that such reports are intended for wider publication the information shall be aggregated such that individual data items should not be identifiable.

PLANNING DATA REQUIREMENTS

PC.A.1. INTRODUCTION

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PC.A.1.6 The following paragraphs in this Appendix relate to **Forecast Data**:

3.2.2(b), (h), (i) and (j)(part)
4.2.1
4.3.1
4.3.2
4.3.3
4.3.4
4.3.5
4.5(a)(ii) and (b)(ii)
4.7.1
5.2.1
5.2.2
5.X.1

PC.A.1.7 The following paragraphs in this Appendix relate to **Registered Data** and **Estimated Registered Data**:

2.2.1
2.2.4
2.2.5
2.2.6
2.3.1
2.4.1
3.2.2(a), (c), (d), (e), (f), (g), (j) (part) and (k)
3.4.1
3.4.2
4.2.3
4.5(a)(i), (a)(iii), (b)(i) and (b)(iii)
4.6
5.3.2
5.4
5.X.3
6.2
6.3

DETAILED PLANNING DATA

PC.A.5 GENERATING UNIT DATA

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PC.A.5.X **Mothballed Generating Unit** and Alternative Fuel Information

Data identified under this section PC.A.5.X must be submitted as required under PC.A.1.2 and at **NGC**'s reasonable request.

PC.A.5.X.1 **Mothballed Generating Unit** Information

Generators must supply with respect to each **Mothballed Generating Unit** the estimated MW output which could be returned to service within the following time periods from the time that a decision to return was made:

< 1 month;
1-2 months;
2-3 months;
3-6 months;
6-12 months; and
>12 months.

The return to service time should be determined in accordance with **Good Industry Practice** assuming normal working arrangements and normal plant procurement lead times. The MW output values should be the incremental values made available in each time period as further described in the **DRC**.

PC.A.5.X.2 **Generators** must also notify **NGC** of any significant factors which may prevent the **Mothballed Generating Unit** achieving the estimated values provided under PC.A.5.X.1 above, excluding factors relating to **Transmission Entry Capacity**.

PC.A.5.X.3 Alternative Fuel Information

The following data items must be supplied with respect to each **Generating Unit** whose main fuel is gas.

For each alternative fuel type (if facility installed):

(a) Alternative fuel type e.g. oil distillate, alternative gas supply

(b) For the changeover from main to alternative fuel:

- Time to carry out off-line and on-line fuel changeover (minutes).
- Maximum output following off-line and on-line changeover (MW).
- Maximum output during on-line fuel changeover (MW).
- Maximum operating time at full load assuming typical and maximum possible stock levels (hours).
- Maximum rate of replacement of depleted stocks (MWh electrical/day)
- Is changeover to alternative fuel used as part of normal operating arrangements?
- Number of successful changeovers carried out in the last **NGC Financial Year** (choice of 0, 1-5, 6-10, 11-20, >20).

(c) For the changeover back to main fuel:

- Time to carry out off-line and on-line fuel changeover (minutes).
- Maximum output during on-line fuel changeover (MW).

PC.A.5.X.4 **Generators** must also notify **NGC** of any significant factors and their effects which may prevent the use of alternative fuels achieving the estimated values provided under PC.A.5.X.3 above (e.g. emissions limits, distilled water stocks etc.)

Data Registration Code

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DRC.6.1 Schedules 1 to ~~14~~ 15 attached cover the following data areas.

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DRC.6.1.15 **SCHEDULE 15 – MOTHBALLED GENERATING UNIT AND ALTERNATIVE FUEL DATA**

Comprising information relating to estimated return-to-service times of **Mothballed Generating Units** and the capability of gas-fired **Generating Units** to operate using alternative fuels.

DRC.6.2 The **Schedules** applicable to each class of **User** are as follows:

Generators with **Large Power Stations**	Sched 1, 2, 3, 4, 9, 14, 15
Generators with **Medium Power Stations** (See note 2)	Sched 1, 9, 14, 15
Generators with **Small Power Stations** directly connected to the **NGC Transmission System**	Sched 1, 6, 14, 15
All **Users** connected directly to **NGC Transmission System**	Sched 5, 6, 9
All **Users** connected directly to the **NGC Transmission System** other than **Generators**	Sched 10,11,13
All **Users** connected directly to **NGC Transmission System** with **Demand**	Sched 7, 9
A **Pumped Storage Generator, Externally Interconnected System Operator** and **Interconnector Users**	Sched12 (as marked)
All **Suppliers**	Sched 12
All **Network Operators**	Sched 12
All **BM Participants**	Sched 8

Notes:

1. **Network Operators** must provide data relating to **Small Power Stations** and/or **Customer Generating Plant Embedded** in their **Systems** when such data is requested by **NGC** pursuant to PC.A.3.1.4 or PC.A.5.1.4.

2. The data in schedules 1, 14 and ~~14~~ 15 need not be supplied in relation to **Medium Power Stations** connected at a voltage level below the voltage level of the **Subtransmission System** except in

connection with a **CUSC Contract** or unless specifically requested by **NGC**.

Data Registration Code

SCHEDULE 15
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MOTHBALLED GENERATING UNIT INFORMATION

The following data items must be supplied with respect to each **Mothballed Generating Unit**.

Power Station _____ **Generating Unit** Name (e.g. Unit 1) _____

DATA DESCRIPTION	UNITS	DATA CAT.	**GENERATING UNIT** DATA						
			< 1 month	1 - 2 months	2 - 3 months	3 - 6 months	6 - 12 months	> 12 months	Total MW being returned
MW output that can be returned to service	MW	DPD							

Notes

1. The time periods identified in the above table represent the estimated time it would take to return the **Mothballed Generating Unit** to service once a decision to return has been made.
2. Where a **Mothballed Generating Unit** can be physically returned in stages covering more than one of the time periods identified in the above table then information should be provided for each applicable time period.
3. The estimated notice to physically return MW output to service should be determined in accordance with **Good Industry Practice** assuming normal working arrangements and normal plant procurement lead times.
4. The MW output values in each time period should be incremental MW values, e.g. if 150MW could be returned in 2 - 3 months and an additional 50MW in 3 - 6 months then the values in the columns should be Nil, Nil, 150, 50, Nil, Nil, 200 respectively.
5. Significant factors which may prevent the **Mothballed Generating Unit** achieving the estimated values provided in this table, excluding factors relating to **Transmission Entry Capacity**, should be appended separately.

ALTERNATIVE FUEL INFORMATION

The following data items for alternative fuels need only be supplied with respect to each **Generating Unit** whose primary fuel is gas.

Power Station _____ **Generating Unit** Name (e.g. Unit 1) _____

DATA DESCRIPTION	UNITS	DATA CAT.	GENERATING UNIT **DATA**			
			1	2	3	4
Alternative fuel type (* please specify)	Text	DPD	Oil distillate	Other gas *	Other *	Other *
CHANGEOVER TO ALTERNATIVE FUEL						
For off-line changeover:						
Time to carry out off-line fuel changeover	Minutes	DPD				
Maximum output following off-line changeover	MW	DPD				
For on-line changeover:						
Time to carry out on-line fuel changeover	Minutes	DPD				
Maximum output during on-line fuel changeover	MW	DPD				
Maximum output following on-line changeover	MW	DPD				
Maximum operating time at full load assuming:						
Typical stock levels	Hours	DPD				
Maximum possible stock levels	Hours	DPD				
Maximum rate of replacement of depleted stocks of alternative fuels	MWh(electrical) /day	DPD				
Is changeover to alternative fuel used as part of normal operating arrangements?	Text	DPD				
Number of successful changeovers carried out in the last **NGC Financial Year** (** delete as appropriate)	Text	DPD	0 / 1-5 / 6-10 / 11-20 / >20 **	0 / 1-5 / 6-10 / 11-20 / >20 **	0 / 1-5 / 6-10 / 11-20 / >20 **	0 / 1-5 / 6-10 / 11-20 / >20 **

SCHEDULE 15
Page 3 of 3

DATA DESCRIPTION	UNITS	DATA CAT.	GENERATING UNIT **DATA**			
			1	2	3	4
CHANGEOVER BACK TO MAIN FUEL						
For off-line changeover:						
Time to carry out off-line fuel changeover	Minutes	DPD				
For on-line changeover:						
Time to carry out on-line fuel changeover	Minutes	DPD				
Maximum output during on-line fuel changeover	MW	DPD				

Notes

1. Where a **Generating Unit** has the facilities installed to generate using more than one alternative fuel type details of each alternative fuel should be given.
2. Significant factors and their effects which may prevent the use of alternative fuels achieving the estimated values provided in this table (e.g. emissions limits, distilled water stocks etc.) should be appended separately.