

## Stage 03: Report to the Authority

Grid Code

# B/11 Provisions for Electronic Communication of System Warnings between NGET and Users

What stage is this document at?

- |    |                         |
|----|-------------------------|
| 01 | Working Group Report    |
| 02 | Industry Consultation   |
| 03 | Report to the Authority |

This proposal seeks to modify the Grid Code to in relation to the notification and delivery of National Electricity Transmission System Warning messages to Users in order to allow such messages to be delivered via electronic means

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

**Published on:** 20 September 2011



**High Impact:**

None



**Medium Impact:**

None



**Low Impact:**

Generators, Distribution Network Operators, other Users in receipt of National Electricity Transmission System Warning messages

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### Any Questions?

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Contact:

**Tom Ireland**

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[thomas.ireland@uk.ngrid.com](mailto:thomas.ireland@uk.ngrid.com)



**01926 656152**

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Proposer:

**National Grid**

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## About this document

This Report to the Authority outlines a proposal to modify the Grid Code and contains the information required for The Authority to form an understanding of a defect within the Grid Code and the proposed solution in order to make a determination.

To modify the Grid Code a Modification Proposal must be taken to the Grid Code Review Panel (GCRP). This Modification Proposal will outline the background to the issue, how to address it, any impacts it may have on the industry and a recommendation for the GCRP to proceed to a Working Group or to an Industry Consultation.

The GCRP, based on the Modification Proposal, will determine if any further work or debate is required. If the group feels that the issue could benefit from further examination it will be progressed to a Working Group. Terms of Reference will be created to outline the purpose and scope of the Working Group, as well as any timelines for reporting back to the GCRP. The Working Group will then meet to discuss the issue and produce a Working Group Report. This Working Group Report is then presented to the GCRP to determine if the Terms of Reference have been met and that a robust solution has been developed to meet the defect within the Grid Code.

If the GCRP feels that the issue has already been investigated thoroughly and a robust solution has been developed, the Modification Proposal will progress to an Industry Consultation. Grid Code Industry Consultations last approximately one month but timescales can alter based on the complexity of the issue.

Following the conclusion of the Industry Consultation, a Report to the Authority is produced which takes into account any responses to the Industry Consultation and puts forward recommendations to Ofgem on how to address the defect within the Grid Code. The Authority then considers the issue and the proposed solutions to make a determination.

## 1 Executive Summary

- 1.1 This paper proposes a change to the Grid Code in relation to the notification and delivery of **National Electricity Transmission System Warning** messages to Users.
- 1.2 This is currently achieved via a combination of telephone and facsimile notification.
- 1.3 Currently, the Grid Code specifically requires that, in certain circumstances, confirmation of **National Electricity Transmission System Warning** messages will be delivered by facsimile.
- 1.4 To provide the necessary flexibility to allow for the use of electronic communication of **National Electricity Transmission System Warning** messages, it is proposed that specific Grid Code OC7 requirements for notification of **National Electricity Transmission System Warnings** via fax are removed.
- 1.5 An associated Grid Code Consultation was published which closed on 27th June 2011 and five responses were received, which were all supportive of the proposals.

## 2 Purpose & Introduction

### Introduction

- 2.1 As National Electricity Transmission System Operator (NETSO), National Grid Electricity Transmission plc (NGET) is required to send **National Electricity Transmission System Warning** messages to applicable Users as and when appropriate.
- 2.2 This is currently achieved via a combination of telephone and facsimile notifications, traditionally delivered via the National Grid Operational Broadcast System (OBS).
- 2.3 The OBS system has reached the end of its serviceable life, and limitations of the system have resulted in the need to revert to manual telephone and facsimile processes.
- 2.4 National Grid is currently exploring options to replace the OBS.
- 2.5 Currently, the Grid Code specifically requires system warning messages to be delivered by facsimile.
- 2.6 To provide the necessary flexibility to allow for a modern design for the future OBS replacement, including options for electronic communications facilities, it is proposed that the specific Grid Code requirement for facsimile notification of **National Electricity Transmission System Warnings** is removed.

### Summary of Current Grid Code Requirements

- 2.7 The Grid Code (OC7.4.8.3) places the following requirements on NGET and Users in respect of electronic data communication of National Electricity Transmission System Warning messages:

#### OC7.4.8.3

...

- (c) **National Electricity Transmission System Warnings** will be issued by fax, to the facsimile number(s) and locations agreed between **NGET** and **Users**, or by such electronic data transmission facilities as have been agreed. In the case of **Generators** with **Gensets** this will normally be at their **Trading Points** (if they have notified **NGET** that they have a **Trading Point**)
- (d) **Users** may at times be informed by telephone or other means of **National Electricity Transmission System Warnings** and in these circumstances confirmation will be sent to those **Users** so notified, by fax as soon as possible.

## The Issue

- 2.8 The current wording of the Grid Code in **OC7.4.8.3 (d)** explicitly states that confirmation of **National Electricity Transmission System Warnings** initially made by telephone will be sent to applicable users “by fax as soon as possible”.
- 2.9 Additionally, it could be inferred from **OC7.4.8.3 (c)** that the primary form of **National Electricity Transmission System Warnings** should be via fax.
- 2.10 Specific Grid Code requirements for Facsimile messages preclude the option to implement a modern communication system to replace the OBS that includes electronic communication facilities.

### 3 Description of Proposed Modification and its Effects

#### Proposed Modification

- 3.1 It is proposed to remove specific references to faxes in OC7.4.8.3 as follows:

#### OC7.4.8.3

....

- (c) **National Electricity Transmission System Warnings** will be issued ~~by fax, to the facsimile number(s) and locations agreed between NGET and Users, or~~ by such ~~electronic~~ data transmission facilities as have been agreed between NGET and Users. In the case of **Generators** with **Gensets** this will normally be at their **Trading Points** (if they have notified **NGET** that they have a **Trading Point**).
- (d) **Users** may at times be informed by telephone ~~or other means~~ of **National Electricity Transmission System Warnings** and in these circumstances confirmation will be sent to those **Users** so notified by such data transmission facilities as have been agreed between NGET and Users as soon as possible.

## 4 Consultation Responses

- 4.1 National Grid has consulted Authorised Electricity Operators (AEO) on this issue. Five responses were received. All responses are included in Annex 1 of the Report to the Authority, along with National Grid's replies to each AEO.
- 4.2 Respondent B/11-CR01 (CE Electric) is supportive of the proposal as described in the industry consultation issued by National Grid.
- 4.3 Respondent B/11-CR02 (EDF) is supportive of the proposal and stated it provides necessary consistency and clarification to Users with regard to future communication systems for System Warnings.
- 4.4 Respondent B/11-CR03 (E.ON UK) is supportive of the proposal and noted that the cost and period of notice for consequential changes to a User's own communication systems must be reasonable.
- 4.5 Respondent B/11-CR04 (RWE) is supportive of the intent of the proposal but requested clarification of the detailed process to be followed by National Grid during future system warning communication and its impact on Users.
- 4.6 National Grid's response states that this proposal is intended to allow future flexibility, moving away from the sole, prescriptive use of faxes rather than to define and constrain the detail of how such future systems would work. It was confirmed by National Grid that any such future communication system will be fully developed in conjunction with Users.
- 4.7 Respondent B/11-CR05 (Scottish Power) is supportive of the proposal and comments that it provides the opportunity to National Grid and Users to agree communications that best fit their operational requirements.

## 5 Impacts & Assessment

### Impact on National Electricity Transmission System (NETS)

- 5.1 The proposed modification will not impact the National Electricity Transmission System other than to increase the flexibility of future communication facilities for the delivery of **National Electricity Transmission System Warnings**.

### Impact on Grid Code Users

- 5.2 The proposed modification will provide greater flexibility for the design of future communication facilities for the delivery of **National Electricity Transmission System Warnings**. The specific form of future communications will depend on the systems developed, and agreement with Users.

### Impact on Greenhouse Gas emissions

- 5.3 The proposed modification has no detrimental impact on Greenhouse Gas emissions, but provides an opportunity to develop electronic forms of communication in lieu of faxes, thereby reducing paper usage.

### Assessment against Grid Code Objectives

- 5.4 Of the Grid Code Objectives:
- (i) to permit the development, maintenance and operation of an efficient, co-ordinated and economical system for the transmission of electricity;
  - (ii) to facilitate competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity) ; and
  - (iii) subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;

National Grid considers that the modification supports the objective of paragraph (iii) through the opportunity to develop more efficient communication facilities in respect of **National Transmission System Warnings** whilst not materially impacting Objectives (i) or (ii).

### Impact on Core Industry Documents

- 5.5 The proposed modification does not impact on any core industry documents.

### Impact on Other Industry Documents

- 5.6 The proposed modification does not impact on any other industry documents.

## Annex 1 – Consultation Responses

The following table provides a list of the responses received to the Grid Code Consultation, B/11. The full responses can be found below.

Reference	Company
B/11-CR-01	CE Electric UK
B/11-CR-02	EDF Energy
B/11-CR-03	E.ON UK
B/11-CR-04	RWE
B/11-CR-05	Scottish Power

## Annex 2 – National Grid’s Replies

The following table provides a list of the replies that National Grid has made to the consultation responses to Consultation, B/11. The full replies can be found below

Reference	Company
B/11-CRR-01	CE Electric UK
B/11-CRR-02	EDF Energy
B/11-CRR-03	E.ON UK
B/11-CRR-04	RWE
B/11-CRR-05	Scottish Power

## Annex 3 – Proposed changes to the Grid Code

This annex contains the suggested changes to the Grid Code text that will give effect to the proposal contained within this paper.

### OC7.4.8.3

....

- (c.) **National Electricity Transmission System Warnings** will be issued ~~by fax, to the facsimile number(s) and locations agreed between NGET and Users, or~~ by such ~~electronic~~ data transmission facilities as have been agreed ~~between NGET and Users~~. In the case of **Generators** with **Gensets** this will normally be at their **Trading Points** (if they have notified **NGET** that they have a **Trading Point**).
  
- (d) **Users** may at times be informed by telephone ~~or other means~~ of **National Electricity Transmission System Warnings** and in these circumstances confirmation will be sent to those **Users** so notified by such data transmission facilities as have been agreed between NGET and Users as soon as possible.

## Annex 1 – Consultation Responses

The following table provides a list of the responses received to the Grid Code Consultation, B/11. The full responses can be found below.

Reference	Company
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B/11-CR-02	EDF Energy
B/11-CR-03	E.ON UK
B/11-CR-04	RWE
B/11-CR-05	Scottish Power



Your ref Grid Code B11

Our ref

Stephen Curtis  
National Grid Electricity Transmission plc  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

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98 Aketon Road  
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WF10 5DS

<http://www.ce-electricuk.com/>

**tel:** 0191 229 4422

**fax:** 01977 605594

20<sup>th</sup> June 2011

**e-mail:** [mark.nicholson@ce-electricuk.com](mailto:mark.nicholson@ce-electricuk.com)

Dear Stephen

**Grid Code consultation B11 - Provisions for Electronic Communication of System Warnings between NGET and Users**

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.

CE Electric UK is supportive of the proposal described in the consultation document.

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

Yours sincerely

*Sent by email*

Mark Nicholson  
**Head of System Strategy**

**CE ELECTRIC UK FUNDING COMPANY**

Registered Office: Lloyds Court, 78 Grey Street, Newcastle upon Tyne, NE1 6AF  
Registered in England and Wales. Registered Number: 3476201

If you would like an audio copy of this letter, a copy in large type, Braille or another language, please call 0800 652 6543

**Ireland, Tom**

---

**From:** .Box.Grid.Code  
**Sent:** 27 June 2011 15:59  
**To:** Derry, Thomas; Ireland, Tom  
**Subject:** FW: B/11 Provision for Electronic Communication of System Warnings between NGET and Users - EDF Energy Response

---

**From:** McKinney, Hannah [mailto:Hannah.McKinney@edfenergy.com]  
**Sent:** Monday, June 27, 2011 3:37 PM  
**To:** .Box.Grid.Code  
**Cc:** Sanchez-Lopez, Diego; ^Transmission & Trading Arrangements  
**Subject:** B/11 Provision for Electronic Communication of System Warnings between NGET and Users - EDF Energy Response

Dear Stephen,

**B/11 Provision for Electronic Communication of System Warnings between NGET and Users**

EDF Energy welcomes the opportunity to comment on National Grid's consultation on Communication of System Warnings. We support consistency across all areas of the Grid Code and its application to enable the secure, economic and efficient operation of the electricity transmission system.

The proposal does not represent any material change to the Grid Code. It principally provides necessary consistency and clarification to users with regard to providing flexibility for the design of future communication facilities for the delivery of National Grid Transmission System Warnings.


On a related housekeeping point, the development and future form of electronic communication systems need to be developed with a level of security as appropriate to this type of notification.

Should you wish to discuss any of the issues raised in our response or have any queries please contact me.

Yours Sincerely,

Hannah McKinney

Hannah McKinney  
Corporate Strategy and Regulation  
Transmission and Trading Arrangements

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eon-uk.com

Guy Phillips  
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guy.phillips@eon-uk.com

Monday 27 June 2011

Dear Stephen

**RE: Grid Code B/11 Provisions for Electronic Communication of System Warnings  
between NGET and Users**

E.ON UK welcomes the opportunity to respond to this consultation and supports the proposed changes to the Grid Code, as it provides flexibility for future development of modern communication facilities. As new systems are implemented Users will require sufficient notice to be able to implement their own system changes to interface with any future NGET method of communication. The costs to Users of implementing any system changes required must not be unreasonable.

Yours sincerely

Guy Phillips  
Grid Interface Executive

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Coventry CV4 8LG

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Electricity Codes Regulatory Frameworks  
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Name John Norbury  
Phone +44 (0)1793 892667  
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E-Mail john.norbury@RWE.com

17<sup>th</sup> June 2011

Dear Tom

**RWE RESPONSE – B/11 PROVISIONS FOR ELECTRONIC COMMUNICATION OF SYSTEM WARNINGS BETWEEN NGET AND USERS**

Thank you for the invitation to provide comments on the above Grid Code consultation dated 27<sup>th</sup> May 2011. The following response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Npower Renewables Limited and RWE Supply & Trading GmbH.

RWE is supportive of the intent of the proposed change and considers that permitting other data transmission facilities to be used as an alternative to the fax will enable system warnings to be issued more efficiently. However, we note that the consultation makes no mention of the process to be followed by NGET and Users in agreeing the other data transmission facilities to be used. We are concerned that each time the data transmission facilities utilised by National Grid change, costs are likely to be incurred by Users in integrating the change of facilities with their internal systems.

Before the Grid Code change is implemented we request that National Grid clarify:

- (i) the alternative data transmission facilities available by which a User may choose to receive warnings,
- (ii) format of the data to be sent via the alternative data transmission facilities
- (iii) confirmation that the User may choose to continue to receive warnings via fax
- (iv) the procedure to be followed to confirm that warnings / messages have been received by the User.

I trust that you will find the above comments helpful. If you wish to discuss any matters further please do not hesitate to contact me.

Yours sincerely  
By e-mail  
John Norbury  
Network Connections Manager

**RWE Supply & Trading GmbH**  
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**Ref** GC B/11  
**Date** 3<sup>rd</sup> June 2011

**Tel No.** 01355 814808  
**Email:** [electricityspoc@scottishpower.com](mailto:electricityspoc@scottishpower.com)

Dear Stephen,

Consultation Document for **B/11: Provisions for Electronic Communication of System Warnings between NGET and Users**

ScottishPower welcomes the opportunity to provide comment on the above consultation. This response is submitted on behalf of ScottishPower's Energy Wholesale Business, which includes ScottishPower Generation Ltd and ScottishPower Energy Management Ltd.

ScottishPower are supportive of the proposed changes to the Grid Code. In an ever evolving technological environment it makes sense to remove outdated and restrictive communications methods. This provides NGET and Users with the opportunity to agree methods which fit more with their respective operational requirements.

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,

**Gary Henderson**

For and on behalf of: ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd and ScottishPower Energy Management Ltd.

## Annex 2 – National Grid’s Replies

The following table provides a list of the replies that National Grid has made to the consultation responses to Consultation, B/11. The full replies can be found below

Reference	Company
B/11-CRR-01	CE Electric UK
B/11-CRR-02	EDF Energy
B/11-CRR-03	E.ON UK
B/11-CRR-04	RWE
B/11-CRR-05	Scottish Power

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20<sup>th</sup> September 2011

Ref: B/11-CRR-01

Dear Mark,

**B/11 Provisions for Electronic Communication of System Warnings between NGET and Users**

Thank you for your response on 20<sup>th</sup> June 2011 to our consultation on proposals to modify the Grid Code relating Electronic Communication of System Warnings Consultation B/11.

National Grid received a positive response from the industry with representations being received from five industry parties. All the responses supported the recommendations of the proposal and recommended its implementation. I would like to note the support you gave in your response to the Consultation.

The publication of the Final Report to the Authority will also occur today. If you have any queries or outstanding issues please contact me at [thomas.ireland@uk.ngrid.com](mailto:thomas.ireland@uk.ngrid.com)

Yours sincerely

Tom Ireland

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Hannah McKinney  
EDF Energy

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20<sup>th</sup> September 2011

Ref: B/11-CRR-02

Dear Hannah,

**B/11 Provisions for Electronic Communication of System Warnings between NGET and Users**

Thank you for your response on 27<sup>th</sup> June 2011 to our consultation on proposals to modify the Grid Code relating Electronic Communication of System Warnings Consultation B/11.

National Grid received a positive response from the industry with representations being received from five industry parties. All the responses supported the recommendations of the proposal and recommended its implementation.

I would like to note your support for the proposals and agree that they provide flexibility and consistency for the future design of communication system for transmission system warnings. In regards to the specific related housekeeping comment you made, National Grid notes and support the concept that future communication systems should have an appropriate level of security and anticipate that this will be fully considered during their design stages.

The publication of the Final Report to the Authority will also occur today. If you have any queries or outstanding issues please contact me at [thomas.ireland@uk.ngrid.com](mailto:thomas.ireland@uk.ngrid.com)

Yours sincerely

Tom Ireland

Commercial Analyst  
Electricity Codes  
National Grid

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20<sup>th</sup> September 2011

Ref: B/11-CRR-03

Dear Guy,

**B/11 Provisions for Electronic Communication of System Warnings between NGET and Users**

Thank you for your response on 27<sup>th</sup> June 2011 to our consultation on proposals to modify the Grid Code relating Electronic Communication of System Warnings Consultation B/11.

National Grid received a positive response from the industry with representations being received from five industry parties. All the responses supported the recommendations of the proposal and recommended its implementation.

In response to your specific comment raised, I agree that as new communication systems are developed Users should have sufficient notice in order to undertake the changes to their systems which will allow a system interface. In addition, the cost to Users for implementing any system changes must be fully considered during the design phase and not be unreasonable.

The publication of the Final Report to the Authority will also occur today. If you have any queries or outstanding issues please contact me at [thomas.ireland@uk.ngrid.com](mailto:thomas.ireland@uk.ngrid.com)

Yours sincerely

Tom Ireland

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20<sup>th</sup> September 2011

Ref: B/11-CRR-04

Dear John,

**B/11 Provisions for Electronic Communication of System Warnings between NGET and Users**

Thank you for your response on 17<sup>th</sup> June 2011 to our consultation on proposals to modify the Grid Code relating Electronic Communication of System Warnings Consultation B/11.

National Grid received a positive response from the industry with representations being received from five industry parties. All the responses supported the recommendations of the proposal and recommended its implementation.

In response to your specific comments, I would firstly like to note your support for the proposals and also provide the requested clarifications to a number of aspects you identified:

- **Potential for undue costs and system integration issues;**

Indeed a number of respondents commented that costs associated with any new system should be proportionate, and National Grid agrees that a cost benefit analysis should form part of the design stage of any new communication system.

- **Whether a User can continue to receive warnings via faxes;**

National Grid believes that the proposed Grid Code change leaves sufficient flexibility for faxes to continue to be the agreed communication method of System Warnings if this were deemed appropriate.

- **Alternative data transmission facilities available;**

- **Format of the data transmissions;**

- **That the procedure for their use should be defined in advance of the Grid Code change.**

Considering these points together, firstly the intention of this proposed change is to create the flexibility to agree to move away from the proscriptive use of faxes, subject to a suitable system being designed and associated detailed processes agreed with Users. It was not the intention to explicitly define or constrain the detail of such a future system at this stage. I would like to reiterate that any such future system will be developed in conjunction with the Users whom it will have a material impact on.

The publication of the Final Report to the Authority will also occur today. If you have any queries or outstanding issues please contact me at [thomas.ireland@uk.ngrid.com](mailto:thomas.ireland@uk.ngrid.com)

Yours sincerely

Tom Ireland

Commercial Analyst  
Electricity Codes  
National Grid

Mr Gary Henderson  
On behalf of Scottish Power

Tom Ireland  
Commercial Analyst

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20<sup>th</sup> September 2011

Ref: B/11-CRR-05

Dear Gary,

**B/11 Provisions for Electronic Communication of System Warnings between NGET and Users**

Thank you for your response on 3<sup>rd</sup> June 2011 to our consultation on proposals to modify the Grid Code relating Electronic Communication of System Warnings Consultation B/11.

National Grid received a positive response from the industry with representations being received from five industry parties. All the responses supported the recommendations of the proposal and recommended its implementation. I would like to note the specific support you provided in your response and agree with your comment that the proposals provide Users with the opportunity to agree communication methods that best fit their respective operational requirements.

The publication of the Final Report to the Authority will also occur today. If you have any queries or outstanding issues please contact me at [thomas.ireland@uk.ngrid.com](mailto:thomas.ireland@uk.ngrid.com)

Yours sincerely

Tom Ireland

Commercial Analyst  
Electricity Codes  
National Grid

## Annex 3 – Proposed changes to the Grid Code

This annex contains the suggested changes to the Grid Code text that will give effect to the proposal contained within this paper.

### OC7.4.8.3

....

- (d) **National Electricity Transmission System Warnings** will be issued ~~by fax, to the facsimile number(s) and locations agreed between NGET and Users, or~~ by such ~~electronic~~ data transmission facilities as have been agreed between NGET and Users. In the case of **Generators** with **Gensets** this will normally be at their **Trading Points** (if they have notified **NGET** that they have a **Trading Point**).
  
- (d) **Users** may at times be informed by telephone ~~or other means~~ of **National Electricity Transmission System Warnings** and in these circumstances confirmation will be sent to those **Users** so notified by such data transmission facilities as have been agreed between NGET and Users as soon as possible.