

## THE NATIONAL GRID COMPANY plc

### Revisions to the Grid Code

#### Consultation Paper E/01

### USE OF E-MAIL FOR THE COMMUNICATION OF DATA, INFORMATION AND NOTICES

**24<sup>th</sup> September 2001**

A. Introduction

1. The National Grid Company plc ("National Grid"), in accordance with its obligations under paragraph 2 of Condition 8A 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 relates to the Use of e-mail for the communication of data, information and notices under the Grid Code. The proposed changes to the Grid Code were discussed at the Grid Code Review Panel meeting held on 13<sup>th</sup> September 2001. Panel members agreed that National Grid should issue a Consultation Paper.
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 8A 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 8A 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 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

### 5. Background

5.1 When the Grid Code was first produced approximately 11 years ago data and information was exchanged between Users using traditional methods and the technology of the day. This generally made use of the postal system. The use of e-mail as a means of communication was then in its infancy, but with the advent of quicker and more powerful computing devices the use of e-mail for transmitting information and data has become routine.

5.2 The Grid Code contains many references to 'in writing' or 'written', which are defined in Section 2 (vi) of the Glossary and Definitions to include typewriting, printing, lithography and producing words in other non-transitory forms. These generally relate to the form in which information needs to be given. In addition, the Grid Code contains references to the form of submission of data and notices. These are principally in the General Conditions, although there are further references in the Grid Code to the provision of data 'by post'.

5.3 In many instances data, information and notices could effectively be provided by e-mail, but in so doing non-compliance with the Grid Code may result unless e-mail is included as a method of communication.

### 6. The Proposed Changes

6.1 It is proposed that the General Conditions (GC.6.1.1) is amended to include 'electronic mail to a specified address' in the list of delivery methods. In addition it is proposed that the Glossary and Definitions – Construction of References (vi), which deals with the meaning of 'in writing', is amended to include 'electronic communication' in the list of references and that this paragraph is then relocated to GC.6, as this is a more logical location. Approaching the changes in this way avoids having to alter every reference to 'in writing' and like terms to add the concept of an electronic copy as well' The proposed amendments to the Construction of References and GC.6 are given in Appendix 1.

6.2 It is further proposed that GC.6.1.1 could be clarified such that it is clear that data and notices can be sent either to National Grid or to Users. It is also proposed that the terms 'registered' and 'telex' can be deleted from the text as it is unlikely that either of these forms are used any longer.

6.3 There are several Grid Code paragraphs where the terms 'in writing' or 'written' are used in a context other than communication between National Grid and Users and as such do not fall within the scope of this consultation. For information the Grid Code paragraphs referred to are as follows:

OC1.6.2  
 OC7.4.8.1  
 OC8.2.2  
 OC8.4.3.5  
 OC9.4.7.11(b)(vii)  
 OC12.4.6.1  
 G&D – Definition of RISSP

6.4 The way in which it is proposed to change the meaning of 'in writing' and 'written' means that the current meanings of these provisions remain unaltered. The intention of this proposal is to enable the use of an alternative method of communication in addition to those already detailed in the Grid Code. The sender and receiver of electronic communications would be expected to make the necessary arrangements to ensure that data and

information communicated can be read and acknowledged, just as is expected with communications by any other means, and these arrangements are not considered as being part of the explicit requirements of the Grid Code, but merely part of the general requirement on National Grid and Users to comply.

B. COMMENTS

7. 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<sup>th</sup> October 2001. The comments will be reviewed and responded to and National Grid will then prepare its report to the Authority.

8. Your formal responses may be:-

Posted to: Mr David Payne  
Commercial Development  
The National Grid Company plc  
National Grid House  
Kirby Corner Road  
Coventry  
CV4 8JY

Faxed to: 024 7642 3298

Emailed to: david.payne@uk.ngrid.com



## Appendix 1

### Extract from Glossary and Definitions – Construction of References.

- .....
- ~~(vi)~~ references to "in writing" or "written" include typewriting, printing, lithography and other modes of reproducing words in a legible and non-transitory form;
  - (vii) where the **Glossary and Definitions** refers to any word or term which is more particularly defined in a part of the **Grid Code**, the definition in that part of the **Grid Code** will prevail over the definition in the **Glossary & Definitions** in the event of any inconsistency;
  - (viii) a cross-reference to another document or part of the **Grid Code** shall not of itself impose any additional or further or co-existent obligation or confer any additional or further or co-existent right in the part of the text where such cross-reference is contained;
  - ~~(ixviii)~~ nothing in the **Grid Code** is intended to or shall derogate from **NGC's** statutory or licence obligations;
  - (ix) a "holding company" means, in relation to any person, a holding company of such person within the meaning of section 736, 736A and 736B of the Companies Act 1985 as substituted by section 144 of the Companies Act 1989 and, if that latter section is not in force at the **Transfer Date**, as if such latter section were in force at such date;
  - (xi) a "subsidiary" means, in relation to any person, a subsidiary of such person within the meaning of section 736, 736A and 736B of the Companies Act 1985 as substituted by section 144 of the Companies Act 1989 and, if that latter section is not in force at the **Transfer Date**, as if such latter section were in force at such date;
  - ~~(xii)~~ references to time are to London time; and
  - (xii) Where there is a reference to an item of data being expressed in a whole number of MW, fractions of a MW below 0.5 shall be rounded down to the nearest whole MW and fractions of a MW of 0.5 and above shall be rounded up to the nearest whole MW.

< End of GD >

### Extract from General Conditions

GC.6 MISCELLANEOUSGC.6.1 Data and Notices

- GC.6.1.1 Data and notices to be submitted either to **NGC** or to **Users** under the **Grid Code** (other than data which is the subject of a specific requirement of the **Grid Code** as to the manner of its delivery) shall be delivered in writing either by hand or sent by ~~registered~~ first-class pre-paid post, or by ~~telex or~~ facsimile transfer or by electronic mail to a specified address or addresses previously supplied by **NGC** or the **User** (as the case may be) for the purposes of submitting that data or those notices.
- GC.6.1.2 References in the Grid Code to “in writing” or “written” include typewriting, printing, lithography, and other modes of reproducing words in a legible and non-transitory form and in relation to submission of data and notices includes electronic communications.
- GC.6.1.23 Data delivered pursuant to paragraph GC.6.1.1, in the case of data being submitted to **NGC**, shall be addressed to the National Grid Control Centre at the address notified by **NGC** to each **User** prior to connection, or to such other Department within **NGC** or address, as **NGC** may notify each **User** from time to time, and in the case of notices to be submitted to **Users**, shall be addressed to the chief executive of the addressee (or such other person as may be notified by the **User** in writing to **NGC** from time to time) at its address(es) notified by each **User** to **NGC** in writing from time to time for the submission of data and service of notices under the **Grid Code** (or failing which to the registered or principal office of the addressee).
- GC.6.1.34 All data items, where applicable, will be referenced to nominal voltage and **Frequency** unless otherwise stated.