

GOVERNANCE OF THE COMPLIANCE PROCESS

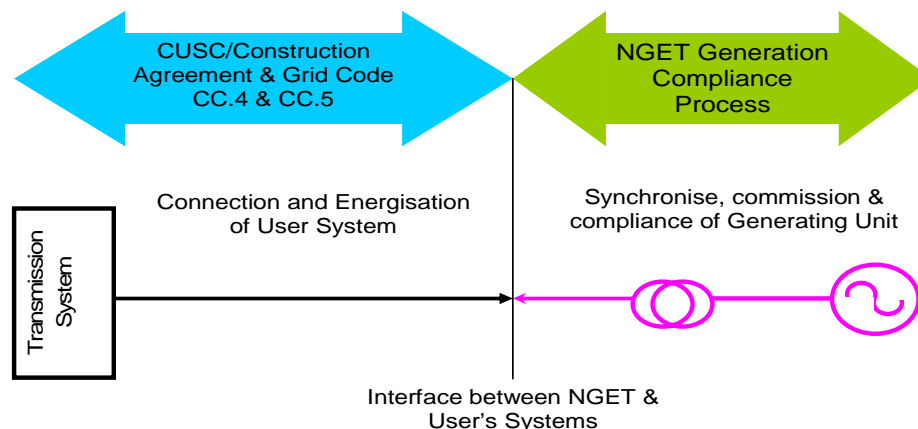
(Discussion Proposals by National Grid)

Introduction

1. The meeting of the Grid Code Review Panel in September 2007 set up a working group to examine how the compliance process, which has been in practical operation since vesting, might be brought under the governance of the Grid Code. Since the first meeting of the working group, National Grid has been reviewing the compliance process, the existing Grid Code and Construction Agreement to identify the extent to which any additions and/or amendments may be required. National Grid recognises that further work will be required to cover the full remit of the working group's objectives. However, this paper outlines its proposals for the incorporation of the compliance process associated with the connection of a new directly connected generator.

Background

2. It is recognised that the process between a User signing a connection agreement with National Grid and finally completing a power station, having demonstrated compliance with the Grid Code, can take several years to complete. Along the way the process is punctuated by a number of key notifications between the User and National Grid accompanied by the submission of data and plant testing.
3. Through examination of the full compliance process outlined within the Guidance Notes, National Grid has identified that a large part is already included in sections CC.4 and CC.5 of the Grid Code with cross reference from the CUSC and/or Construction Agreement. This element covers the construction, commissioning and energisation of National Grid's and the User's plant and apparatus at the interface between respective systems and is applicable to all types of user connection, both demand and generation.
4. The process for managing the synchronising of a new generating unit and subsequent demonstration that the requirements of the Grid Code have been met is not currently contained in either CUSC or Grid Code but has been developed by National Grid since vesting as the Generation Compliance Process. The diagram below attempts to illustrate this split for a basic generation connection.



Philosophy of Proposals

5. Given that the Grid Code already includes for the commissioning of a new connection point in Connection Conditions CC.4 and 5, National Grid believes that the best way forward is to extend these sections to include the Generation Compliance Process. In doing this, the existing format of CC.4 and CC.5 should be maintained with CC.4 outlining the process and CC.5 exploring the requirements associated with each of the stages of the process. For simplicity and as set out above, the proposals attached for initial discussion are based on the basic process for a new generator connecting to the transmission system.
6. The initial proposals encompasses the issue of time limited notifications to manage demonstration of compliance whilst commissioning new generation through to the issue of a final notification acknowledging that either compliance with the Grid Code has been satisfactorily demonstrated or the granting of a derogation from the Authority for any non-compliance.
7. The proposals also enshrine the principle that the Generator should self certify that the plant meets the Grid Code and demonstrates aspects of compliance by simulation and testing. Additionally, the User Data Library filing structure, already included in the STC at BETTA, for the depositing of all relevant data pertinent to the compliance process has also been incorporated.
8. As discussed above, the proposals attached are limited to the basic compliance process and the Working Group should recognise that further work will be required to cover all the other aspects needing consideration including:
 - Lifetime Compliance for modifications & failures
 - LEEMPS and BELLA stations compliance
 - Specification of Simulations
 - Specification of Tests required & Performance Acceptance Criteria
 - Relationship with OC5
 - Power Park Unit Type Testing & Registration

Recommendation

9. The Working Group is asked to discuss these initial proposals.