

**Joint Grid Code and Distribution Code Review Panels Working Group  
Implementation of Technical Requirements for Licence Exempt Embedded  
Medium Power Stations**

**Minutes of 8th Meeting held on 28 January 2005 at NGT House, Warwick**

Present

Ben Graff	National Grid (Chair)
Patrick Hynes	National Grid
Sue Newbould	National Grid (Technical Secretary)
Guy Nicholson	Econnect
Mike Kay	United Utilities
Steve Argent	Ofgem (observer)
Nigel Turvey	Western Power
Chris Berry	SP PowerSystems
John Norbury	RWE Trading
Claire Maxim	E.ON UK

Apologies

Charlie Zhang	EDF
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**Review of minutes of 7<sup>th</sup> Meeting held on 12 October 2004**

1. The minutes were agreed as being accurate.

**Review of actions**

2. The outstanding actions were reviewed. The new actions resulting from this meeting have been included in the new and ongoing actions record.
3. With respect to Action 12/10/04 10 and the wording of PC.5.5, after a discussion the WG agreed any estimated values assumed for planning purposes would be updated with actual values "as soon as reasonably practicable after energisation".
4. With respect to Action 12/10/04 13, MK advised that in principle he has an objection to NGC having a right to veto the DNO's choice of name for the User Site unless there is an OC8 or safety implication. In PH's opinion there is a clear operational reason for having different names. JN suggested the removal of the word "confusingly" from CC.5.2.2(d). It was agreed to discuss this issue outside of the meeting once WG members had determined what the existing naming provisions are and whether NGC has the right to veto.
5. With respect to Action 12/10/04 15, PH advised that references to "Site Responsibility Schedules" should be removed because the DNO is responsible for preparing such schedules for embedded generators. PH suggested the removal of CC.5.2.2(c) and (e) as these are not NGC's responsibility and CC.5.3(b) as this is not required. PH took an action to review the requirements in CC.5.2.2 and CC.5.3(b).

**OC5 Testing**

6. JN said generators and manufacturers work with NGC in the carrying out of tests during initial testing and costs incurred are not charged to anybody. JN advised that he has not had experience of instances where NGC has had problems at testing. It is clear in JN's mind that BC2.10.3 allows for a BOA to

be issued where an instruction to carry out a test results in a change of output. JN agreed tests would have to be abandoned if the market price was extreme.

7. JN said the WG needs to guard the industry against a generator who refuses to participate. MK said this is a commercial issue and not a Grid Code/D Code issue. PH agreed the WG needs to establish a mechanism where tests are carried out and any reasonable costs are compensated. MK hoped common sense would continue to prevail within the industry. A mechanism is needed that will work in the event of any dispute.
8. PH asked what could be included in the drafting eg NGC to pick up reasonable costs but this is not a Grid Code issue. MK queried what would happen if the parties could not agree. Embedded generators have a contractual relationship via the DNO and not a licence requirement. JN said there is the sanction of revoking the generator's licence exemption but there is potentially a time limit on this. The WG thought this was a CUSC issue rather than a Grid Code/D Code issue and would need to be covered in the DNO Connection Agreement. MK suggested that if there was a parallel CUSC consultation then a back off arrangement could be put in the CUSC and the DNO could include it in the Connection Agreement with the generator. JN asked whether a simplistic mechanism could be put in the CUSC and wondered whether the proposed drafting in OC5.8.2 already covers this issue.
9. CM asked whether the embedded generator would go to the DNO for their costs associated with testing. The WG thought this would be the case and NGC would then pay the DNO.
10. The WG discussed what would happen if the generator was the aggrieved party. The generator has no licence therefore the WG wondered whether there should be something in the generator agreement with the DNO that would be determinable.
11. JN pointed out that the only OC5 objective in respect of SVA embedded generation is compliance with Connection Conditions. The only test NGC would do is to check the generator is stable. JN queried whether this would be picked up anyway by monitoring or notification of a problem by a customer. The WG said there might not be compensation if the problem was identified under monitoring. JN made the point that compensation may not be a big issue if only testing for Connection Conditions because if a BMU, the embedded generator would have an agreement with NGC or if the generator was providing services then they would also have an agreement.
12. MK summarised by saying the risks of there being any costs are small. Therefore write obligations in the codes which become commercial issues which may be covered in the CUSC.
13. JN would like to see the OC5 drafting being clearer in respect of SVA registered generators. PH said he thought he had done this. An action was placed on all to review the OC5 drafting and send any comments to PH. PH said he would list what tests are likely to apply to SVA registered generation since we need to understand the types of tests and potentially there may be a resulting action to consider the tests.
14. BG will give a briefing at the next meeting of the WG on the implications of CUSC consequential changes.

### **Generic Provisions implications**

15. PH advised that the 'minded to' decision letter in respect of the Generic Provisions consultation mentions implementation of the changes to the GB Grid Code from 1 April 2005. PH said the LEEMPS drafting will need redrafting to reflect Generic Provisions. PH does not think this should create any new issues.
16. The WG discussed the issue of Power Park Modules and to clarify how this would apply in respect of connections on the Distribution System.
17. PH advised that the GB Grid Code is to be drafted to accommodate changes resulting from Generic Provisions. The GB Grid Code would then be amended for LEEMPS. There would be D Code redrafting as a consequence.
18. PH advised that an update on Generic Provisions and its impact on LEEMPS work would be given to the February Panel.

#### **BETTA interaction – wider implications for D Code**

19. MK has circulated a "BETTA" version of the D Code. He asked the WG to provide him with any comments on this version. MK advised that he does not think there is any great issue arising from BETTA which will impact on the D Code.

#### **EELPS interactions - implications**

20. MK's observation was that he does not think that the EELPS proposal greatly impacts on LEEMPS because EELPS and LEEMPS do not interact.
21. However, in Scotland, PH pointed out that licence exempt Medium Power Station (5 to 30MW in SPT's area) could be affected by LEEMPS as they would have to comply with the GB Grid Code. Currently in Scotland Medium Power Stations would comply with the D Code and Scottish G Code. The Scottish Grid Code recognises some plants do not comply with the relevant Grid Code conditions and will come to some agreement. For existing unlicensed Scottish embedded MPS, if they could not comply with the GB Grid Code, SA agreed NGC would apply for a derogation.
22. The WG agreed with JN's suggestion of making reference to EELPS in the LEEMPS report.
23. MK said he will review whether "BEGA" is still an appropriate term or whether "BELLA" should also be included.
24. GN queried why the LEEMPS route could not be used for large license exempt embedded generators in Scotland. PH explained that such generators have a greater electrical impact on the operation of the lower voltage transmission system in Scotland.

#### **Review timetable**

25. PH set out the planned timetable as follows:
  - Verbal update at February Panel
  - Draft report to be circulated to WG for comments
  - WG to meet to consider the draft report
  - Final report presented to May Panel
  - If endorsed by the Panel then NGC to go out to consultation
  - Line up codes/CUSC

26. JN asked about the interim implementation of these arrangements and whether the report should recognise and map out transitional arrangements. PH said he did not imagine any existing generator would need to change their plant as a result of this work; if not compliant then would need a derogation. PH's view is that it would be a paper exercise to change from a LEGA to the new arrangement. PH reminded the WG that comments can be made on the draft paper. JN re-affirmed his view that the report should recognise the step change and transitional provisions need to be recognised.

### **Next Steps**

27. The next steps are:
- Draft report and new GB Grid Code redrafting
  - Revisit D Code drafting
  - Identify CUSC impacts
  - Issue GB Grid Code drafting before the report
  - Circulate draft report early March
  - Meet on 14<sup>th</sup> March to discuss report
  - Comment on and refine the report during April
  - Panel meeting 19<sup>th</sup> May

### **Any other business**

28. G75 – in response to a query MK recognises G75 would be affected, and need at least consequential changes. G75 does not impose Grid Code provisions.
29. Scope – Medium Power Stations in Scotland and BETTA impact were covered under agenda item 6.

### **Next Meeting**

30. The ninth meeting of the WG was scheduled for **Monday 14 March 2005** at NGT House, Warwick starting at 11:00.