

Response to second GB Grid Code consultation
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Dear Bridget

Grid Code BETTA Consultation

This letter is my response on behalf of Magnox Generation within BNFL to the BETTA Grid Code Consultation dated 30 September 2003, which is currently available on the Ofgem website. As you know I have attended a number of meetings of the BETTA Grid Code Expert Group, and made a number of comments on the drafting. However, this letter is specifically commenting on the above consultation document and the versions of the marked up drafts that were attached to it.

The comments in this letter are not confidential.

Important Issues for BNFL

The England and Wales Grid Code currently has a number of clauses which provide special provisions for nuclear power stations. It is an important consideration for BNFL Magnox that such clauses should not be changed in a way that could place at risk the established way of operating our plant, or the existing nuclear safety cases for our power stations. In particular, we wish to ensure that the intent of special clauses that refer to "existing gas-cooled reactor plant" is retained, and that their meaning is not changed in a way that is detrimental to us. These existing clauses are as follows:

GD Definition of "existing gas-cooled reactor plant"
OC2.1.1(d), OC2.2.3, OC2.4.3.2(e), OC2.4.4.1, OC2.4.4.2
BC2.9.4.4, BC2.9.4.6, BC2.9.5.1
BC3.5.3, BC3.5.4(e), BC3.7.6

I am happy that the consultation draft does not affect any of these clauses in a material way. On a minor point, the numbering of paragraph BC3.5.3 has disappeared in the version of the draft I downloaded from the Ofgem website

There are also several clauses in the England and Wales Grid Code relating to safety of plant, which allowing certain actions to be taken, or certain instructions to be refused, on safety grounds. We also wish to ensure that the intent of these clauses is retained. The clauses that could be relevant to us are:

CC6.3.13, CC7.7.2
OC2.4.1.3.5(c)(v)
OC9.4.7.4(b), OC9.5.2.2(d)
BC2.5.1(c), BC2.5.2.4, BC2.5.4(c), BC2.6.1, BC2.7.3(a), BC2.7.4(c), BC2.8.3,
BC2.8.4(c), BC2.9.2.1, BC2.11.3, BC2A.2.6(Maximum MVAr Output),
BC2A.2.6(Maximum MVAr Absorption)
BC3.5.5

Again I am happy that the consultation draft does not affect any of these clauses in a material way.

Our Chapelcross plant in Scotland will cease generation by the end of March 2005, before the current planned start date of BETTA, so it is not an issue for us to retain particular clauses in the Scottish Grid Code that might relate to the operation of nuclear power stations. In any case, I am not aware of any protections in the Scottish Grid Code that are not also provided by existing clauses in the England and Wales Code.

Responses to Questions in the Consultation Document

I will now respond to some of the points where the consultation document specifically invited views. I have referenced these to the numbered sections.

4.17, 4.19

One way of avoiding the problems with aligning different codes such as the Grid Code and the proposed SO/TO Code (STC) is to merge the codes. I expressed my view in a response to an earlier consultation in February this year that as far as possible the technical interface between all parties who own, operate or use the transmission system should be in the Grid Code, and that this should include all the data flow requirements. I pointed out that having a single document would minimise difficulties with governance and co-ordinating the documents, and would improve transparency. That is still my view.

4.107

It seem reasonable to me to modify the definition of genset to include all directly connected generation, if that is the easiest way of ensuring that the system operator is able to give instructions to all directly connected generation.

5.7

I believe that the correct thing to do is to base the proposed GB Grid Code on the latest approved versions of the England and Wales and Scottish Grid Codes. The cleanest thing is to show the latest GB Grid Code change-marked against the latest version of the England and Wales Grid Code. Where a change to an existing code is approved, it should be incorporated as soon as possible in the draft GB code; I do not believe it is necessary to specifically re-consult on its inclusion in the draft GB code, if it has been properly consulted on for the existing code.

6.6

As the GB code is being produced as a modification of the England and Wales Code, I believe it is important to provide a route map from clauses in the Scottish Code to clauses in the draft GB Code, for the benefit of the Scottish users, and to ensure that clauses do not get lost in the process. It would also be beneficial if a public seminar could be held before the final draft of the GB Code, in which the key changes were summarised, and to invite discussion.

6.28

CC.6.2.1.2 is one of the more unfortunately complicated parts of the England and Wales Grid Code. The principle of it is to require that certain plant and apparatus shall comply with certain standards, but recognises that standards may change with time, and does not require the application of new standards retrospectively on plant and apparatus which already exists, and which complied properly with earlier standards. This principle is fine, but difficult to express succinctly. In addition the dates which appear in the England and Wales Code may not be the right ones to use when incorporating the Scottish networks into the same code. There is also the issue of whether post-BETTA the standards to apply should be the “system operator” standards or the relevant “transmission owner” standards.

6.47

The system of “colour coded” warnings, very similar to that currently used in Scotland, was in use in England and Wales until Revision 23 of the England and Wales Grid Code in December 1997. This change in England and Wales did not cause any particular problems, so it should not do so in Scotland either. It would not be sensible to retain two different terminologies for system warnings.

Drafting Comments

Until I read the draft code, I had not realised that NGC was not going to be required to have separation between its functions as GB System Operator and Transmission Owner in England and Wales, and hence have separate licences for these two functions. If this were done, it would be easier to demonstrate that the Transmission Owners in Scotland were being treated in an equitable way. It would also permit the wording in the Grid Code to be much clearer in places, since all references to the Transmission Licensee could be to the “relevant Transmission Licensee”.

I have one minor comment with regard to the definition of “Total System”. I feel that this should have the word “Interconnected” in it somewhere. This was probably not necessary in England alone, but is needed for Scotland. In particular, is Shetland part of the “Total System”?

I hope my comments are helpful.

Yours sincerely

David M Ward