

Bridget Morgan
Technical Directorate
Office of Gas and Electricity Markets (OFGEM)
9 Millbank
London
SW1P 3GE

25 November 2003

Dear Bridget

Response to second GB Grid Code Consultation

Thank you for the opportunity to comment on the second GB Grid Code Consultation.

Key Points:

- BE supports the development of the GB Grid Code based upon the existing E&W code provided that specific clauses applicable to nuclear power stations are retained, to ensure:-
 - continued compliance with our nuclear site licence, and
 - no degradation of existing clauses which could present difficulties with the nuclear regulator.
- It is recognised in the consultation that Users will continue to have an interface directly with the transmission licensees in Scotland. BE continues to believe that it is appropriate to consider having a separate licence for the GBSO which should provide greater clarity within the GB Grid Code.
- Certain obligations are governed by the SO/TO Code (STC), some of which directly affect Users, such as site safety matters. Should a transmission licensee wish to vary the requirements through the STC it is not unreasonable to expect that Users are represented on review panels via an appropriate governance regime.
- Given the reliance of our station safety cases on the transmission system, we continue to believe that a separate seat should be specifically reserved on the GB GCRP for nuclear generators.
- Without the benefit of a full suite of documents, including the complementary STC and any associated/subsidiary documents to 'back-off' its provisions, to see how everything 'fits' our comments cannot be considered to be conclusive.

Detailed Comments:

(Comment numbering used is as per Volume 1 of the Consultation).

6.5 BE notes that the consultation does not include a full consideration of regional differences which are being discussed in the GBGC Expert Group forum. BE is pleased to be involved in this expert group to help identify a minimum set of necessary regional differences.

4.62 et seq. In our response to the earlier December 2002 consultation, we highlighted our concerns and noted a compelling case to designate one of the generator Panel seats as ‘nuclear’. It is important that transmission system connections in relation to issues which integrally support nuclear station safety case requirements in support of Loss of Offsite Power (LOSP) and reliability issues etc. are fully considered. Whilst we note the Ofgem proposal both to increase the generator representation to 6 seats (as opposed to the 7 earlier suggested) and redefining the ‘capacity’ criteria, we do not accept the Ofgem premise that reserving a seat for nuclear generators is not considered “to be a change required for BETTA” (4.64) and we are concerned that failure to provide a ‘nuclear’ seat will be seen as a degradation of our existing position.

4.80 We would reiterate that it is important to recognise the current provisions in the Scottish grid code for ‘*alternative plant performance requirements*’ (Scottish Grid Code CC1.6) which are described in site specific connection agreements. Application of existing E&W grid code criteria on a GB basis is supported but, subject to a full impact assessment, existing compliant or derogated Scottish connected plant should be offered appropriate derogations against the GB code requirements wherever possible. Whilst we note that Ofgem/DTI will “consider the position of existing plant, (and any request for derogations) in the context of transition and implementation issues”, given the timescales for BETTA, it is important that a process for such issues to be resolved is defined in a timely manner.

4.101 The redefining of Genset will potentially impose requirements on much smaller units than in E&W that are connected to 132kV Transmission in Scotland. While such an arrangement is not ideal we accept the Ofgem/DTI argument that the GBSO needs to be able to exercise operational control over plant directly connected to the transmission system. In these circumstances we would support an approach to revise the Grid Code definition of Genset. This is more transparent than changes made via a bilateral agreement and is therefore our preferred approach.

5.10 It seems appropriate to include any approved changes to the E&W GC in subsequent drafts of the GBGC suitably change marked to identify the differences.

6.6 Using the E&W Grid Code as the basis of the GBGC will inevitably mean that existing Scottish Users will be at least unfamiliar with the layout and not necessarily aware of some implications. In these circumstances it seems sensible to offer some form of briefing and/or open questions session for Scottish Users.

6.28 When Clause CC6.2.1.2 was drafted there were probably good reasons for excluding plant pre-1999. The post January 1999 clauses seem to allow the SO to specify which of the options (if any) in such specifications are applicable. Without knowledge of the consultations that went on at the time it is difficult to draw conclusions about the relevance of the dates for Scottish Users. The current consultation K/03 Governance of Electrical

Standards is supposed to add transparency and suitable governance to technical requirements material to Users which should render such 'woolly' clauses as CC6.2.1.2 irrelevant.


6.31 On the basis that Clause CC.7.1 does not confer any specific obligations or rights it would appear sensible to remove but it begs the question as to why it was included in the first instance. CC7 is where it has been deemed necessary to distinguish between the SO and Relevant Transmission Licensees for Scotland. This does not lead to clarity and the distinction seems to be ignored in Appendix 1.

6.36 The use of a Demand Control Notification Level different to Customer Demand Management Notification Level in Scotland seems to be inconsistent (and out of step with E&W) unless there are very good reasons for this.

6.47 We do not see any reason not to adopt the E&W GC risk messages which are far more explicit than the Scottish colour coded warnings. Clearly existing Scottish Users will need briefing on this change in approach. BE receives a regularly updated Control Interface Document from NGC, which includes standard message formats for system warnings and other operational matters. It is anticipated that this document would be updated to embrace our Scottish power stations as a way of communicating the change.

If you wish to discuss any of the above issues please do not hesitate to contact myself, or Steve Phillips (BETTA Project Manager)

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Morris', written in a cursive style.

John Morris
Trading Arrangements & Network Access