

## **GB Grid Code: Operating Codes 1,2,6,7,9,10,12**

### **SP Transmission Response to the Ofgem/DTI Consultation**

#### **Introduction**

SP Transmission (SPT) welcomes the opportunity to comment on this Ofgem/DTI mini-consultation paper on the Grid Code. Our comments should be read in conjunction with our recent response to the consultation “The Grid Code Under Betta”. In this response we make comments about specific points of drafting in the Operating Codes which are complementary to the general points of principle which we made earlier.

#### **GENERAL COMMENTS**

##### ***Thresholds***

In our previous response, we commented that while the issue was of less direct concern to SP Transmission, our experience as the current grid operator in the South of Scotland, would lead us to suggest that the arrangement proposed in respect of generation was overly restrictive. This particularly referred to the proposed MW thresholds proposed for small and medium power stations. Similar concerns arise in respect of other thresholds within the Operating Codes, and are discussed below in more detail.

##### ***Drafting Style***

It is perhaps unfortunate that Ofgem/DTI did not adopt the proposal made by a number of respondents to earlier consultations to pick the best of both the E&W Grid Code and the Scottish Grid Code. Even where the effect of different clauses between the two Grid Codes is essentially the same, the wording in the E&W Grid Code and the proposed GB Grid Code is often significantly less clear than the equivalent wording in the Scottish Grid Code.

Clarity of understanding which is essential to a technical document would have been improved by taking a different drafting convention.

##### ***OC1 – Demand Forecasts***

In general we are content with the changes proposed for this Code. However we have concern over the proposed regional differences noted below.

##### **Demand Control Notification Level**

##### **Customer Demand Management Notification Level**

In this code, and several others under consideration MW levels are set at a different level between the different transmission licensee areas. Two such thresholds are the

Demand Control Notification Level and the Customer Demand Management Notification Level which are set at 5MW in Scotland and 12MW in England and Wales.

The reason given for this difference is that currently there are MW thresholds set in the Scottish Grid Code at 5MW. The major reason for control down to 5MW in the current Scottish Grid Code is the requirement for tie-line control between the two Scottish control areas and between Scotland and England. Under the BGSA the requirement for tie line control between Scotland and England is to maintain the spot transfer within  $\pm 100\text{MW}$  at all times, and within  $\pm 25\text{MWh}$  per half-hour settlement period. In practice these have proven to be challenging targets, thus necessitating the given thresholds. The requirements have thus come from overall generation despatch issues, rather than from system security considerations.

Under BETTA, the Anglo-Scottish Interconnector will become an internal circuit, to be managed by the GBSO as any other internal circuit. Since it has proven to be possible to manage internal circuits in England and Wales under the current arrangements with 12MW thresholds, there is no reason why the GBSO should not be able to manage the transfers across GB with the same thresholds. There is thus no requirement for a regional difference in these two variables.

### Small Power Station

Given the above discussion, and the proposed Ofgem upper size limit of 5MW for a small power station in Scotland (compared to 50MW in England and Wales), the suggestion that the information obligations in Scotland under OC1 should be extended to power stations ten times smaller than those in England and Wales is surprising. We do not support the extension of this right to small power stations.

### ***OC2 –Operational Planning and Data Provisions***

Again, we would generally comment that we would support the proposed changes. The following points of detail are noted

#### Gensets

The proposal to include directly connected generating units within the definition of Gensets is, on the face of it, a sensible one. There are a number of areas within the Grid Code (in particular, relating to the electrical connection) where it will be important to bring all directly connected generating units within the scope of the Grid Code. However, care will need to be taken in extending a Grid Code designed for a 400kV and 275kV system for one with three voltage levels by simple definitional changes. Technical obligations on smaller power stations in other sections of the Grid Code, not within the scope of this consultation, may prove to be unnecessary. Additionally care needs to be taken to ensure that obligations on generators with Small or Medium Power Stations are not duplicated. An example is given below of obligations duplicated between OC2 and OC 1 (see “Duplicated Obligations”)

### Administrative Burden

We would comment that the inclusion of such clauses within the Scottish Grid Code have proven to be an effective way of managing communication between the Companies and Users. The continued inclusion of this clause within the GB Grid Code should be welcomed by both the GBSO and by Users.

### Interconnector Users

Given the proposed change in the trading arrangements, there is no requirement to retain the provisions relating to Interconnector Users. In particular the concept of an SPT/NGC Interconnector User (SGC OC2 5.18) would no longer exist.

### Radio Teleswitching

The obligation to retain supplier notification of Load Management Blocks needs to be carefully considered. There are two main reasons for such notification. The first requirement is tie-line control as discussed above under notification levels. The second reason is for system security considerations in certain parts of the country. As above, it is not appropriate to retain supplier notification of Load Management Blocks for tie line control purposes. Where there are system security considerations it might be appropriate. If the obligation is retained as a regional difference, it should be restricted to the information transfer which is strictly necessary to run the system.

### Load Transfer Capability

There is no significant difference between a notification level of 10MW and a notification level of 12MW in respect of manual and automatic load transfer capability. There is no requirement for a regional difference.

### Duplicated Obligations

While in general, the change of definition of Genset to include directly connected generating units is sensible, the net result is that there will be duplicated obligations between OC1 and OC2. These will include the obligation on the operators of directly connected medium power stations to provide similar information under both OC1 and OC2.

### Definitional Changes

Following the change of the definition of “Gensets”, the text needs to be carefully read to make it consistent. Examples of where the text is inconsistent include:

- (i) OC2.4.1.1(a) – the scope of interaction between Generators and the System Operator will include Gensets.
- (ii) OC2.4.1.2.1 – the phrase “a provisional Genset outage programme (covering both Embedded and non-Embedded Large Power Stations” no longer makes sense.

## ***OC6 – Demand Control***

In general the harmonisation of obligations between Scotland and England is consistent with the rest of the Betta project. Appropriate changes include the use of the EWGC system of warnings and the merging of the two types of network operator demand control (voltage reduction and disconnection). Other specific points are addressed below.

### **Demand Control Notification Level**

As discussed above under the section on OC1, there is no reason for this parameter to be set differently between Scotland and England.

### **Demand Disconnection Levels**

The EWGC provides for emergency disconnection up to 20% without notification, for up to 40% when a “High Risk of Demand Reduction” notice has been given, and such further reduction as the Network Operator can make available. It is appropriate to harmonise this obligation across GB.

### **Low Frequency Disconnection**

The proposed regional difference remains appropriate under Betta. Publication of the applicable frequencies would aid transparency of the obligations to Users.

### **GSP Specific Reduction**

We would agree that the implicit obligation within OC6.7.2 that a 20% demand reduction must be achieved on each individual GSP may be difficult to arrange for certain GSPs, and is inconsistent with the statement in OC6.5.3 that the requirement is spread “as far as possible uniformly across all Grid Supply Points”. It would be appropriate to explicitly acknowledge that this obligation can be achieved on a wider basis.

## ***OC7 – Operational Liaison***

We have no comments on the proposed drafting.

## ***OC9 – Contingency Planning***

This Code will require further review once the role of the TOs in Contingency Planning has been further discussed within STEG, and in respect of the STC proposals.

## ***OC10 – Event Information Supply***

We have no specific comments on the proposed drafting.

## ***OC12 – System Tests***

On the whole the two existing Grid Codes are very similar, and we have no difficulties with the GBGC proposals. However, by their very nature, System Tests are difficult enough to organise without the additional hurdle of the proposed GBGC OC12.4.4.4 that failure to respond to a Test Proposal prevents the System Test from taking place (as compared to the requirements within the Scottish Grid Code that failure to respond will be deemed to mean approval, providing the Test Coordinator can show that the User received the proposal).