GB Grid Code
Operating Code 8 (SGC OC6), Operating Code 11 (SGC OC9) and Balancing Codes

An Ofgem/DTI mini-drafting consultation document

10 February 2004

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1. Introduction

1.1. The rationale for the introduction of a GB Grid Code[1] (GBGC) was published in December 2002 (the "December 2002 GBGC consultation"). In September 2003, Ofgem/DTI published "The Grid Code under BETTA, Ofgem/DTI conclusions and consultation on the text of a GB Grid Code and consultation on change co-ordination between the STC[2] and user-facing industry codes" (the "September 2003 GBGC consultation"). This document included draft one of the GBGC (GBGC D1) as Volume 2. GBGC D1 was based on the England and Wales Grid Code (EWGC) adapted to apply across GB and included some significant regional differences that had been identified from a comparison of the Scottish Grid Code (SGC) and the EWGC that were highlighted in the September 2003 GBGC consultation as needing to continue under the GBGC.

1.2. It was also recognised in the consultation that there were more detailed regional differences that needed to be considered for inclusion in the GBGC and that Ofgem/DTI were progressing work to identify the differences between the two existing Grid Codes. Also, the September 2003 GBGC consultation did not contain drafts of GBGC OC8 (Safety Co-ordination) and GBGC OC11 (Numbering and Nomenclature of High Voltage Apparatus at Certain Sites), which at that time were still under consideration by Ofgem/DTI.

1.3. The September 2003 GBGC consultation proposed that, in progressing the drafting of the GBGC, and in preparation for the next consultation on a full draft of the GBGC planned for March 2004, it would be helpful to conduct a number of "mini-drafting consultations" on the various sub-codes of the GBGC. The mini-drafting consultations are intended to supplement the proposals presented in the September 2003 GBGC consultation and to draw out in more detail the technical differences between the SGC and the EWGC and to consult on further regional differences that should be incorporated in the GBGC, to be designated under BETTA. It is not intended for the mini-drafting consultations to consider further the issues raised in the September 2003 GBGC consultation

[1] 'The Grid Code under BETTA, Ofgem/DTI consultation on a Grid Code to apply throughout GB' Ofgem/DTI, December 2002. Ofgem #78/02.
[2] The 'System Operator (SO) – Transmission Owner (TO) Code'.

where views have already been invited. It is hoped that the mini-drafting consultations may solicit further responses to those received to the September 2003 GBGC consultation on more of the detail of the GBGC drafting. It has not been possible to consider those responses in the preparation of this mini-drafting consultation. All responses will be taken into account by Ofgem/DTI in their development of the second draft of the GBGC to be published in March 2004.

1.4. The Grid Code Expert Group (GCEG)[3] was established prior to the December 2002 GBGC consultation to provide technical expertise to assist Ofgem/DTI in writing their consultations. The group is supported by the transmission licensees and several users. The sub-codes of the GBGC that are considered in each mini-drafting consultation will have been discussed at the GCEG prior to Ofgem/DTI publishing the mini-drafting consultations. The mini-drafting consultations will comprise:

- a detailed comparison of each sub-code of the SGC and the EWGC to provide a cross reference to the SGC and to identify regional differences between the existing codes
- identification of differences between the EWGC and the GBGC
- identification of differences between the SGC and the GBGC
- identification of regional differences that it is proposed should apply to that sub-code that will not be harmonised for BETTA go-live, and
- GBGC drafting or changes to GBGC D1 (depending on the volume of identified changes) for the sub-code.

1.5. This mini-drafting consultation is on the Operating Code 8 (OC8 – Safety Co-ordination – OC6 in the SGC), Operating Code 11 (Numbering and Nomenclature of HV Apparatus - OC9 in the SGC) and the Balancing Codes (BCs). A summary of the changes in moving to GBGC OC8 and GBGC OC11 for parties in Scotland and parties in England and Wales is presented in sections 4 and 5. To assist users in Scotland who might be unfamiliar with the

[3] See BETTA (GCEG) area of 'Ofgem's work' on the Ofgem website www.ofgem.gov.uk.

EWGC, the SGC OCs have been compared with the equivalent EWGC OCs and differences between the two codes have been identified. This analysis is presented in the appendices in comparison tables. In addition to the comparison tables, the full drafts of the proposed GBGC OC8 and OC11 are appended and as this is the first time they have been published they are published as "draft 1". Any changes marked have been identified against the current version of the EWGC in the same manner as was used in GBGC D1. A comparison table has not been provided for the GBGC BCs as the equivalent sub-codes in the SGC, the Scheduling and Despatch Codes are very different. Draft text for the BCs is not appended to this consultation as no further changes have been identified from GBGC D1. Views are requested on the proposals throughout the document.

1.6. As stated in the September 2003 GBGC consultation[4], the approach of Ofgem/DTI in considering regional differences has been, that where these are material, and are as a result of such matters as difference in technical standards or technical requirements of the transmission system, to reflect such differences as currently exist in the drafting of the GBGC. In support of minimising such differences in the longer term, an objective to promote the minimisation of differences between Scotland and England and Wales where the physical characteristics of the transmission system allow has been added to the panel objectives in the General Conditions. Key regional differences were highlighted in the September 2003 GBGC consultation (such as the proposed regional differences in the definition of Small, Medium and Large Power Stations).

1.7. Several regional differences are proposed in this consultation in respect of the procedures described in GBGC OC8. These reflect differences in the procedures which exist in relation to safety co-ordination between the SGC and the EWGC and have been proposed as GCEG expressed that extreme caution should be exercised with respect to changing matters concerning safety co-ordination. Drafting for regional differences has, in the majority of cases, been taken directly from the SGC or EWGC text.

[4] For example, see 4.99 and 4.100 of the September 2003 GBGC consultation.

1.8. It was outlined in the September 2003 GBGC consultation that although some of the activities of the GB system operator referred to in the GBGC may physically be undertaken by transmission owners, they would be conducting those activities under contract with the GB system operator (via the STC) and would not be providing a contractual service to users under the GBGC. In all instances the user's contract would be with the GB system operator. To the extent that the GB system operator would be reliant upon the actions of transmission owners to discharge some of its obligations under the GBGC it was proposed that the obligations on transmission owners to provide specified necessary services to the GB system operator would be set out in the STC.

1.9. Where the subject matter of the GBGC related to responsibilities in relation to health and safety matters, it was proposed in the September 2003 GBGC consultation to make reference to the relevant transmission licensee undertaking the activity[5]. This was because the transmission licensees considered that such an approach would be preferable to avoid any unnecessary confusion of roles/responsibilities in relation to safety matters for the parties undertaking the activity, who might use the Grid Code as a procedural handbook. There was a desire that, in relation to safety matters, it should be clear on the face of the document who was undertaking activities "on the ground". However, wherever action as part of a safety procedure was to be taken by a transmission licensee other than the contractual counter party to the GBGC (ie the GB system operator), it was considered necessary to make clear that the contractual obligation to ensure that the action was undertaken by that transmission licensee would rest with the GB system operator and that the GB system operator would procure that the transmission owner undertook the requisite action through the STC. This approach has been employed in drafting GBGC OC8.

1.10. This approach was also used in the Connection Conditions (CC.7.2)[6] relating to safety matters.

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[5] See paragraph 6.8 of the September 2003 GBGC consultation.
[6] GB Grid Code Connection Conditions, Operating Code 5 and General Conditions, Ofgem/DTI, 28 November 2003. Ofgem #154/03.

1.11. Appendix 1 provides a comparison table for EWGC OC8 and SGC OC6 and supporting definitions. Appendix 2 contains draft 1 of GBGC OC8.

1.12. Ofgem/DTI have not considered it necessary to apply the approach outlined in paragraph 1.9 in the drafting of GBGC OC11 as the matters addressed in OC11 apply to longer timeframes and are not of immediate safety impact.

1.13. Appendix 3 provides a comparison table for EWGC OC11 and SGC OC9. Appendix 4 contains draft 1 of GBGC OC11.

1.14. Other mini-drafting consultations on the GB Grid Code have been published or are planned as follows:

- Operating Codes 1, 2, 6, 7, 9, 10, 12 was published on 31 October, responses 4 December 2003
- Connection Conditions, Operating Code 5 and General Conditions was published on 28 November 2003, responses 9 January 2004, and
- Planning Code, Data Registration Code and Glossary and Definitions, to be published shortly.

2. Timetable and Responses

2.1. The proposed timetable and process for further development of the GBGC is as follows:

- responses to this mini-drafting consultation should be sent by Tuesday 9 March 2004 to Bridget Morgan (details below)
- Ofgem/DTI do not plan to issue a separate conclusions document specifically dealing with respondents' views on each mini-drafting consultation. Instead, Ofgem/DTI plan to publish a conclusions document in March 2004 that will summarise responses to the September 2003 GBGC consultation in full and responses to mini-drafting consultations.

3. Views invited

3.1. Parties are free to raise comments on any of the matters covered in this paper and in particular on those matters where views have been requested. Although transitional issues will be dealt with at a later date separately from the consideration here of the enduring arrangements, respondents should feel free to raise any such matters that arise in consideration of these issues. All responses, except those marked confidential will be published on the Ofgem website and held electronically in the Ofgem Research and Information Centre. Respondents should try to confine any confidential material in their responses to appendices. Ofgem prefers to receive responses in an electronic form so they can easily be placed on the Ofgem website.

3.2. Written responses marked "Response to GBGC OC8 mini-consultation" should be sent by Tuesday 9 March 2004 to:

Bridget Morgan
Technical Directorate
Office of Gas and Electricity Markets (Ofgem)
9 Millbank
London
SW1P 3GE
Tel: 020 7901 7080
Fax: 020 7901 7075

3.3. Please e-mail responses to BETTA.Consultationresponse@ofgem.gov.uk marked "Response to GBGC OC8 mini-consultation". All responses will be forwarded to the DTI.

3.4. If you wish to discuss any aspect of this document, please contact Bridget Morgan at Ofgem bridget.morgan@ofgem.gov.uk or Renata Williams at the DTI (e-mail: renata.williams@dti.gsi.gov.uk, telephone: 020 7215 0442).

4. Operating Code 8 – Safety Co-ordination

Overview of proposed GBGC OC8

4.1. GBGC OC8 describes the role of the users and transmission licensees for safety co-ordination in relation to working on HV apparatus and sets down the contractual obligations that apply between the GB system operator and users in relation to such matters. As outlined in 1.8 and 1.9 this approach has been adopted, as the transmission licensees felt it necessary that, in relation to matters addressed in OC8, it was clear on the face of the documentation who would actually be doing things "on the ground" thereby avoiding any confusion as to respective roles/responsibilities in relation to health and safety matters. The equivalent to GBGC OC8 in the SGC is OC6 (Safety Coordination).

4.2. Appendix 1 sets out a comparison of EWGC OC8 and SGC OC6. Appendix 2 has draft 1 of GBGC OC8, which sets out the proposed procedures for safety co-ordination that shall apply under BETTA.

4.3. As discussed in 1.9, because this OC specifies safety procedures, it has been drafted to reflect that, in practice, much of this activity in Scotland will be conducted by the relevant transmission licensee on behalf of the GB system operator. Views are invited on whether this presentation is helpful or whether the Grid Code is couched generally in such broad terms that such an approach does not add significantly more clarity as to be considered worthwhile. The objective in drafting has been to respond to concerns from the transmission licensees that, in particular, the practical responsibility for roles in relation to safety should be clear to all users on the face of the Grid Code and should avoid implying a role for NGC's practical (or "on the ground") involvement in matters which they will not be required to have a role in relation to BETTA.

4.4. It should be noted that, irrespective of the wording used in OC8 in the Grid Code, it is not possible for any party to contract away obligations arising under health and safety legislation. The purpose of the approach taken to drafting OC8 is to try to reflect, on the face of the document, who will actually be

undertaking matters in relation to safety at a particular site to avoid introducing any possible confusion.

4.5. Note that this approach means that many of the drafting references to "safety co-ordination in Scotland" within GBGC OC8 do not reflect procedural differences but merely clarify that, in Scotland, the relevant transmission licensee (ie SPT or SHETL) will, in practice undertake the role. It should also be noted that the references to "Relevant Transmission Licensees in Scotland" and "the System Operator in England and Wales" are used when there is a need to describe the ownership of transmission equipment.

4.6. For the avoidance of doubt the only contractual relationship that will exist under the GB Grid Code will be between users and the GB system operator. Therefore in terms of seeking remedies for a relevant transmission licensee failing to perform an activity or obligation the user will have a right against the GB system operator under the terms of the GB Grid Code and the GB system operator will have a right against the relevant transmission licensee under the STC. It is noted that the General Conditions concerning "data and notices" (GC.6.1.1 and GC.6.1.3) may need to be amended to include "Relevant Transmission Licensees" to reflect the drafting in GBGC OC8.

Summary of analysis of changes from EWGC OC8 to proposed GBGC OC8

4.7. This section lists matters that have been identified in reviewing the GBGC as a change from the EWGC.

4.8. The following terms are changed:

- "NGC Transmission System" to "Transmission System"
- "NGC" to "System Operator"
- where "NGC" has been used to represent ownership by the transmission company as opposed to the user, then "NGC" has generally been replaced with "Transmission"

4.9. Changes have been made to the "Introduction" (OC8.1) to clarify contractual responsibilities in relation to OC8, given the approach adopted to refer to "Relevant Transmission Licensee" for sites in Scotland (see 4.3 to 4.6 above).

4.10. A new clause has been added (GBGC OC8.1.5) to draw attention to the fact that Site Responsibility Schedules document the Safety Co-ordinators for each site (this is currently noted in EWGC CC.A.1.1.4(c) and SGC CC 5.2.1).

4.11. For some provisions, the requirements are split into those for "England and Wales" and those for "Scotland". This is either to reflect a significant regional difference that was identified from the comparison of the existing Grid Codes or to make clear which party (the GB system operator or the relevant transmission licensee) the user needs to deal with in practice. Similarly, in some places, "NGC" has been replaced by "Safety Co-ordinators for the Transmission System" (e.g. OC8.4.3.2) so that the drafting is applicable to both England and Wales and Scotland. The intention behind this drafting has been not to change the requirements with respect to users or NGC in England and Wales.

Summary of analysis of changes from SGC OC6 to proposed GBGC OC8

4.12. This section lists matters that are identified in the comparison table in Appendix 1 as being a significant difference between OC6 in the SGC and OC8 in the EWGC, but where Ofgem/DTI do not propose to reflect the existing regional difference.

4.13. EWGC terminology has been adopted in the GBGC. In Scotland, safety co-ordination will be between the relevant transmission licensee (rather than, as used in the SGC, "the Company") and the user.

4.14. The comparison table highlights various examples of a difference in drafting between the SGC and the EWGC but which were not considered to be significant by GCEG and so are not proposed as a regional difference.

4.15. The GBGC (e.g. OC8.1.2 and OC8.8) covers safety co-ordination when working near to the Transmission System or User's System. This would be a

new obligation for Scotland and it is noted that these provisions were recently introduced into the EWGC (November 2003). No problems were identified at GCEG when the proposal to apply this on a GB basis was discussed and so they have been included in this GBGC draft, but views are invited on applying these proximity working provisions in Scotland.

4.16. Approval of Safety Rules (dealt with in 4.1 of the SGC OC6) is dealt with in the Connection Conditions of the GBGC. SGC OC6 4.1 requires Users and the Company to communicate changes to Safety Rules. This has not been proposed as a regional difference in GBGC CC7.2 but views are invited as to whether this issue should be considered further as part of the GBGC development work.

4.17. The scope proposed for the GBGC OC8 does not include "Customers with own Generating Plant" who are connected to a distribution network in Scotland (who are within the scope of SGC OC6). It was considered that the provisions necessary for this class of user would be set out in the Distribution Code but views are invited as to whether this view is accurate.

4.18. In many instances, the GBGC uses the term "Local Safety Instructions" where the SGC uses "Safety Rules" (see for example GBGC OC8.1.7.2(2)(b) and SGC OC6 4.2(1)(b)) . Views are invited as to whether the proposed definition of Local Safety Instructions for Scotland is sufficiently clear or whether the definition should be amended to the effect that where no Local Safety Instructions exist the Local Safety Instructions will be the Safety Rules.

4.19. SGC OC6 4.3.1 includes the definition of Requesting Safety Co-ordinator but this is identical to that given in the EWGC glossary and definitions and so it will not be included in the GBGC equivalent OC8.4.2.1 but in the Glossary and Definitions section of the GBGC.

4.20. GBGC OC8.4.3.4, clarifies that references in OC8 to "RISSP" also refer to alternative forms which can be used by Users in place of RISSP forms (in England and Wales) and by Users and Relevant Transmission Licensees (in Scotland). This does not have an equivalent in the SGC, although it seems to be an assumption in the SGC drafting, and therefore it is proposed that this should apply across GB.

4.21. SGC OC6 has a section on "Agreement of Safety Precautions" (4.5) and in addition "Agreement of Isolation" (4.6) and "Agreement of Earthing" (4.8) whereas the EWGC only has "Agreement of Safety Precautions" (OC8.5.1). These latter two sections provide some of the detail that will be recorded in the Safety Log. This difference has not been proposed in the GBGC and views are invited on whether there is a need to maintain these two sections for Scotland.

4.22. GBGC OC8.5.1.3, which enables the Implementing Safety Co-ordinator to identify further Safety Precautions on the System of the Requesting Safety Co-ordinator, will be a new requirement in Scotland. GCEG did not identify any problems with the proposal to apply this additionally in Scotland.

4.23. SGC OC6 4.5.3 (the location of Safety Precautions on Operational Diagrams) is proposed as a regional difference (new provision in GBGC OC8.5.1.4 see 4.49). This provision is also raised in this section on the analysis of changes between the SGC and GBGC because the wording is changed slightly from that in the SGC to avoid confusion with the terms used in the GBGC.

4.24. In the GBGC there is an additional provision concerning a RISSP issue procedure (OC8.5.4.1). No problems were identified at GCEG with applying this on a GB basis.

4.25. SGC OC6 4.10.3 is equivalent to EWGC OC8.5.4.4/5 & 6, except the SGC refers to an exception to allow modification of a RISSP if it is permitted for testing purposes under 4.11. As SGC OC6 4.11 does not seem to explicitly allow for such testing, and therefore this is not proposed as a regional difference. Views are invited on whether this is a significant difference. It is also noted that GBGC OC8.5.4.5, refers explicitly to prefixes and suffixes that form part of RISSP numbers. Views are invited on whether this would be applicable in Scotland, or whether a regional difference to this GBGC provision is required.

4.26. Similarly, SGC OC6 4.10.4 and EWGC OC8.5.4.7 have a difference in that the EWGC permits testing that will not affect the Implementing Safety Co-ordinator's System and that all other testing must follow the procedures in EWGC OC8.6. The SGC requires all testing to be carried out under the provisions of OC6 4.11 (equivalent to EWGC OC8.6). This is not proposed as a

regional difference and views are invited on whether there is an issue with this approach.

4.27. GBGC OC8.5.5.2, a detail concerning the cancellation of RISSPs, will be a new provision to Scotland, but this was not considered significant by GCEG and as such it is proposed that it should be applied across GB.

4.28. GBGC OC8.5.5.3 and 4 are more detailed requirements than those in SCG OC6 4.12.2 and 3. No issues were identified by GCEG in making the more detailed EWGC provisions apply across GB.

4.29. GBGC OC8.5.6 (RISSP change control) will be a new provision to Scotland, but this was not considered significant by GCEG and as such it is proposed that it should be applied across GB.

4.30. The testing provisions in SGC OC6 4.11 and EWGC OC8.6 were considered by GCEG to be equivalent, despite the difference in wording. The SGC OC6 4.11.1(c) has a concept of "transfer of control". It is not proposed to include this as a regional difference and views on this are invited.

4.31. GBGC OC8.7 (Emergency Situations) will be new provisions to Scotland, but this was not considered significant by GCEG and as such should be applied across GB.

4.32. GBGC OC8.8 (Safety Precautions relating to working on equipment near to the HV System) will be new provisions to Scotland, but this was not considered significant by GCEG. Note that a regional difference has been added to GBGC OC8.8.1.3 to reflect the general approach in Scotland that work does not proceed when there is failure to agree the location of the safety precautions, whereas in England and Wales there is a default provision for the location of safety precautions.

4.33. The RISSP-R forms in Appendix A of the existing Grid Codes are very similar. Views are invited on whether it is necessary to specify two forms in Appendix A of the GBGC.

4.34. The RISSP-I forms in Appendix B of the existing Grid Codes are very similar. Views are invited on whether it is necessary to specify two forms in Appendix B of the GBGC.

4.35. Appendix C1 is a diagrammatic representation of the RISSP Issue Process, it is proposed to adopt the EWGC version of this diagram for the GBGC.

4.36. Appendix C2 is a diagrammatic representation of the Testing Process, it is proposed to adopt the EWGC version of this diagram for the GBGC.

4.37. Appendix C3 is a diagrammatic representation of the RISSP Cancellation Process, it is proposed to adopt the EWGC version of this diagram for the GBGC.

4.38. Appendix C4 is a diagrammatic representation of the Process for working near to System Equipment. There is no equivalent SGC diagram for this. It is proposed to adopt the EWGC version of this diagram for the GBGC.

4.39. Appendix E is the Form of Transmission Permit for Work. There is no equivalent SGC form for this. Views are invited on whether a separate form will be required for each licensed area.

4.40. The definition of "Operation Diagrams" is similar, but views are invited on whether these definitions refer to equivalent entities.

Proposed regional differences

4.41. This section lists matters that have been identified by the comparison table in Appendix 1 as having a significant difference between the SGC and the EWGC and where Ofgem/DTI consider it is necessary or appropriate to reflect the existing regional difference. The table in Appendix 1 has further detail of the regional differences.

4.42. Additions have been made to the "Introduction" (GBGC OC8.1) to clarify contractual responsibilities in relation to OC8, given the approach adopted to refer to "Relevant Transmission Licensee" for sites in Scotland.

4.43. SGC OC6 1.2 (Introduction) describes that the Company can agree alternative procedures in place of RISSP. This has been drafted as a regional difference in GBGC OC8.1.6 (see also SGC OC6 4.4.2/GBGC OC8.4.3.2 and GBGC OC8.4.3.3 for the provisions which effect this).

4.44. The EWGC OC8.4.2.1 provides for NGC and the User to have Safety Co-ordinators nominated and "at all times" available. Whereas the SGC OC6 4.3.1 has them "to be available at a timescale agreed in the Connection Agreement". The SGC requirement has been drafted as a regional difference in GBGC OC8.4.2.1.

4.45. SGC OC6 4.3.1 also has that "Users can use trained operators to switch out and make safe circuits before the nominated persons are available on site." The EWGC OC8 does not address the switching out or making safe of circuits. This has not been proposed as a regional difference as it appears to be outside the scope of GBGC OC8 which applies to already de-energised assets. Views are invited on whether such arrangements as are specified in SGC OC6 could be dealt with in Local Safety Instructions or Connection Agreements.

4.46. A regional difference is proposed in GBGC OC8.4.2.2 to reflect SGC OC6 4.3.2 and 4.3.3 where the User and the Company give written notice to each other of who is authorised to act as Safety Co-ordinators.

4.47. A regional difference in proposed in GBGC OC8.4.2.3 where it is not necessary for parties in Scotland to confirm as part of the Safety Co-ordination procedure that they are authorised to act as a Safety Co-ordinator as, in Scotland, the communication will be between two named parties.

4.48. All three transmission licensees currently use different RISSP numbering conventions and generate unique identifiers for each RISSP. The allocation of RISSP prefixes and conventions in EWGC OC8.4.3.5/6 & 7 is not proposed for Scotland as part of the implementation of BETTA as it is understood that it does not accurately reflect the existing arrangements in Scotland.

4.49. The SGC has a provision that the location of the Safety Precautions should be indicated on the Operational Diagram (4.5.3), this is proposed as a regional difference in new clause GBGC OC8.5.1.4.

4.50. In the SGC, failure of the Safety Co-ordinators to agree on the location of isolation or earthing (4.6.1 and 4.8.2) means that the work shall not proceed whereas in the EWGC there is a default provision for the location of safety precautions. A regional difference is proposed in GBGC OC8.5.1.5 and OC8.8.1.3 to reflect this difference.

4.51. In the SGC (4.14), Safety Logs are retained for at least 6 years, in the EWGC they are retained for at least one year. A regional difference has been included in the GBGC to reflect this difference.

4.52. The form in Appendix D is proposed for use only in England and Wales. Views are invited on whether this form is used for other (more general) purposes (as might be implied by the note at the end of the form) than that specified in GBGC OC8.4.3.7 (i.e. circulating RISSP prefix allocations) in which case it may need to be modified so that it could be used across GB.

Specific views sought on proposed GBGC OC8

4.53. Views are sought on all of the drafting proposed for GBGC OC8 (as set out in Appendix 2) and in particular on the conformance of requirements or regional differences proposed in this section 4. Views are also sought on the proposals for the supporting definitions in the second table in Appendix 1 which will appear in the Glossary and Definitions of the GBGC. Views are particularly sought on the areas of existing differences between the Grid Codes which are proposed to be harmonised in the GBGC (matters raised in paragraphs 4.15, 4.16, 4.17, 4.18, 4.21, 4.25, 4.26, 4.30, 4.33, 4.34) and areas where a regional difference is proposed for the GBGC (4.45 and 4.52).

5. OC11 – Numbering and Nomenclature of High Voltage Apparatus at Certain Sites

Overview of proposed GBGC OC11

5.1. EWGC OC11 sets out the procedure for Numbering and Nomenclature of High Voltage Apparatus at Certain Sites. The equivalent in the SGC is OC9 (Numbering and Nomenclature of Electrical Apparatus at Certain Sites). A comparison table is provided in Appendix 3 and draft 1 of GBGC OC11 is provided in Appendix 4.

5.2. Ofgem/DTI have considered the drafting of GBGC OC11 in light of the principles in 1.8 and 1.9. As GBGC OC11 covers procedural matters which take place over reasonably long timescales and in many cases are linked to investment planning decisions, it is proposed that it is not necessary to specify on the face of the code the party who will be undertaking the activity, so in all instances obligations are placed directly on the GB system operator. It is noted that currently all three transmission licensees have their own numbering and nomenclature system and that the proposed drafting is not intended to pre-empt the rights and obligations that will appear in the STC.

Summary of analysis of changes from EWGC OC11 to proposed GBGC OC11

5.3. The following terms are changed:

- "NGC" to "System Operator".
- "NGC Site" to "Transmission Site".
- "NGC" to "Transmission" where NGC implies ownership by a transmission company rather than a user.

5.4. In some places, provisions describe, for example, equipment ownership as being different in Scotland and England and Wales. The intention behind this

drafting has been not to change the requirements with respect to users or NGC in England and Wales.

Summary of analysis of changes from SGC OC9 to proposed GBGC OC11

5.5. EWGC Operating Code 11 and SGC Operating Code 9 are very similar. The main difference between the two is that where there is communication with the User the SGC allows for two months response and the EWGC allows for one month. There is no apparent reason for this to be proposed as a regional difference in the GBGC and the drafting proposes that the timescales in Scotland should conform with those currently defined in the EWGC.

Proposed regional differences

5.6. A regional difference is proposed in GBGC OC11.4.7 concerning the standard for numbering and nomenclature used in England and Wales. The Scottish companies use different standards which are not specified in the SGC and therefore have not been specified in this draft of the GBGC.

Specific views sought on proposed GBGC OC11

5.7. Views are sought on all of the drafting in the proposed GBGC OC11 and in particular on the matters raised in 5.2 and 5.5 and the requirement for a regional difference described in 5.6 above.

6. Balancing Codes (BCs)

Overview of proposed GBGC BCs

6.1. There are three GBGC Balancing Codes (BCs) which set out the procedures for the Pre-Gate Closure Process (BC1) for the Balancing Mechanism, the Post Gate Closure Process (BC2) and the Frequency Control Process (BC3). The equivalent to these codes in the SGC are the Scheduling and Despatch Codes; these are System Scheduling (SDC1), Control Scheduling and Despatch (SDC2) and Frequency Control (SDC3).

6.2. A table has not been provided comparing the SDCs to the BCs as they reflect different processes. No changes are proposed here to the drafting of the BCs issues in GBGC draft1.

6.3. It is noted that Revision 13 to the EWGC, with an effective date of 28th November, introduced some changes to BC2 concerning "Maximum Generation Service". These will be consulted on in the next full draft of the GBGC, although respondents are also invited to comment on this matter, if they wish, in response to this consultation.

Summary of analysis of changes from EWGC BCs to proposed GBGC BCs

6.4. The following terms are changed:

- "NGC" to "System Operator".
- "NGC System Warning" to "Transmission System Warning".
- "NGC Demand" to "GB Demand".

Summary of analysis of changes from SGC SDCs to proposed GBGC BCs

6.5. The SGC SDCs define an entirely different procedure to the GBGC BCs. It was proposed in GBGC draft1 that the definitions of Small Power Station, Medium

Power Station and Large Power Station should have a regional differentiation which reflects the existing despatch limits in the SGC and the GBGC BCs should be read with this in mind[7].

6.6. SGC SDC2 4.5 includes provision for Cascade Hydro Plant to be despatched in MW blocks, with the detail of the plant used to make up the MW block made available to the Company on demand. Elexon are currently consulting on the configuration of non standard BM Units and if cascade hydro plant satisfies the requirements to be treated as a single BM Unit then this may have a consequential impact on the GBGC which may need to incorporate a provision similar to SGC SDC2 4.5.

Proposed regional differences and changes to D1

6.7. GBGC BC1.4.2(a)(i) proposed a regional difference for Physical Notifications for BM Units with a Demand Capacity of greater than 50MW in England and Wales and 5 MW in Scotland (see also GBGC BC2.5.5.1 and BC2.5.52).

Specific views sought on proposed BCs

6.8. Views are sought on the specific matters raised in this section and on whether any requirements currently in the SGC SDCs will not have an appropriate equivalent in the GBGC BCs. These views will be considered in conjunction with the views submitted on the GBGC BCs in response to the September 2003 GBGC consultation.

[7] Note that responses to the September 2003 GBGC consultation in respect of this matter will be considered in the next full Grid Code consultation paper.

Appendix 1 – EWGC OC8/SGC OC6 Comparison Table

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
1	**OC8.1**	**Introduction**		
1.1	OC8.1.1 & OC8.1.3	In the EWGC and SGC, introductory text to describe the purpose of this sub-code as being to establish procedures for Users and the Company/NGC for working on User's Systems or the Transmission System. In both codes the drafting uses an approach where the Company/NGC and the Users are referred to 'as the other system'. System Tests are excluded. In both codes, excludes work where Safety Precautions only need to be approved between Users.	Equivalent.	Changed to explain the contractual arrangements under BETTA and to GB-ise.
n/a	OC8.1.2	In the GBGC, ' **OC8** also covers the co-ordination, establishment and maintenance of necessary safety precautions on the **Implementing Safety Co-ordinator's System** when work is to be carried out at a **User's Site** or a ~~NGC~~ **Transmission Site** (as the case may be) on equipment of the **User** or ~~NGC~~ the **System Operator** or the **Relevant Transmission Licensee** as the case may be where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System**.'	This clause was inserted in the EWGC in November 2003[8] as part of the changes to include provisions for 'working near	Changed to GB-ise.

[8] 'Revision 12' to the EWGC.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			to Transmission equipment'. The SGC does not cover such provisions but they are proposed for inclusion in the GBGC. This would be a new obligation for Scotland, but no problems were identified at GCEG with this proposal.	
1.2	n/a	In the SGC, the Company may agree detailed site specific operational procedures instead of the RISSP procedure detailed in this sub-code (see also 4.4.2).	Propose a regional difference in Scotland to reflect existing site specific arrangements under the SGC OC6.	Regional difference, reflecting existing SGC drafting, is inserted as a new clause GBGC OC8.1.6.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
n/a	OC8.1.3	See SGC 1.1 and EWGC 8.1.3 above.		
1.3	OC8.1.4	In both codes, the sub-code does not seek to impose Safety Rules on either the Company/NGC or the User.	Equivalent.	Changed to GB-ise.
n/a	GBGC OC8.1.5	New provision in the GBGC stating that Site Responsibility Schedules document Safety Co-ordinators for each site.	This statement highlights that the Site Responsibility Schedule records the Safety Co-ordinators for each site (see Connection Conditions appendix 1).	New provision, but no new requirement.
n/a	GBGC OC8.1.6	See SGC 1.2 above.		A regional difference that will apply only in Scotland.
(4.2)	GBGC OC8.1.7 (EWGC OC8.1.5)	See SGC 4.2 below.		

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
2	**OC8.2**	**Objective**			
2.1	OC8.2.1	In the SGC, ' The objective of **Operating Code** No.6 is to achieve the basic principle of **Safety From The System** when work and/or testing on **Plant** and/or **Apparatus** requires the provision of **Safety Precautions** on another system.'	In the GBGC, ' The objective of OC8 is to achieve:- (i) **Safety From The System** when work on or near a **System** necessitates the provision of **Safety Precautions** on another **System** on **HV Apparatus** up to a **Connection Point**; and (ii) **Safety From The System** when work is to be carried out at a **User's Site** or a ~~**NGC**~~**Transmission Site** (as the case may be) on equipment of the **User** or ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee** where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System**.'	Equivalent, taking into account proximity additions in EWGC revision12 (see OC8.1.2 above).	Changed to GB-ise.
2.2	OC8.2.2	'A flowchart, set out in Appendix C, illustrates the process utilised in **OC6** to achieve the objective set out in OC 6.2.1. In the case of a conflict between the flow chart and the provisions of the written text of **OC6**, the written text will prevail.'	'A flow chart, set out in Appendix C, illustrates the process utilised in **OC8** to achieve the objective set out in OC8.2.1. In the case of a conflict between the flow chart and the provisions of the written text of **OC8**, the written text will prevail.'	Identical.	None.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
3.	**OC8.3**	**Scope**		
3.1	OC8.3.1	In the SGC, scope is the Company and Generators, Directly Connected Customers, Customers with Customer Generating Plant and Network Operators. In the EWGC, scope is NGC and Generators, Non-Embedded Customers and Network Operators.	In the EWGC would not necessarily relate to a 'Customer with Customer Generating Plant'. Transmission connected plant will be in scope. Distribution connected will be subject to Distribution Code. Interconnectors are not mentioned in the scope of OC6 and are specifically excluded in	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				OC8. Expect Moyle to be covered in an SO/Moyle Interconnection Agreement.	
4.	**OC8.4**	**Procedure**			
4.1	**CC.7.2**	**Approval of Safety Rules**	**Responsibilities for Safety**		
4.1	CC.7.2.1 to CC.7.2.7	In the SGC, the User and the Company will supply each other with copies of their Safety Rules. Prior to connection, the Company will review and agree the User's Safety Rules in relation to Isolation and Earthing. Changes will be communicated as soon as practicable and will also be reviewed and agreed by the Company.	In the EWGC, the User and NGC will exchange Safety Rules. Also sets out the process for approving the other's Safety Rules for use on its kit at the other's site.	Under the existing arrangements SGC OC6 only provides for exchange of Safety Rules not the agreement process set out in CC.7.2. In practice, in Scotland, the Safety Rules are agreed. In the SGC, changes to Safety Rules are	GBGC Connection Conditions (CCs) amended in draft 1 issued with the September 2003 consultation. Note no further changes were proposed to these CCs in the mini drafting consultation

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				to be communicated. This is not covered in the EWGC but the parties would be in breach of various regulations if they didn't inform each other of such changes. NGC have added this to a list of possible future review work on the EWGC.	on the CCs.
n/a	**OC8.4.1**	**Approval of Local Safety Instructions**			
n/a	OC8.4.1.1 to OC8.4.1.3	In the EWGC, the User and NGC will exchange Local Safety Instructions (LSI). Prior to connection each party must have approved the other's LSI in relation to Isolation and Earthing.		The SGC does not have an equivalent use of 'Local Safety Instructions'. See discussion on Local Safety	Changed to clarify parties involved in the process. Separate sections for England and

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				Instructions in the definition section at the end of this table.	Wales and Scotland to make clear that in Scotland these matters are between the RTL and the User and in E&W between the SO and the User.
4.2	**GBGC OC8.1.7 (EWGC OC8.1.5)**	**Definitions**	**Defined terms**		
4.2	GBGC OC8.1.7.1 & OC8.1.7.2	In the SGC, ' The term **"Safety Precautions"** means one or both of the following paragraphs (1) "**Isolation**" and (2) "**Earthing**" being applied:'	The GBGC has ' **Users** should bear in mind that in **OC8** only, in order that **OC8** reads more easily with the terminology used in ~~**NGC's** and~~ certain ~~**User's**~~ **Safety Rules**, the term "**HV Apparatus**" is defined more restrictively and is used accordingly in **OC8**. **Users** should, therefore, exercise caution in relation to this term when reading and	The comparison of definitions is in the definitions table below.	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
			using **OC8**.' The EWGC defines the terms 'HV Apparatus', 'Isolation' and 'Earthing'.		
4.3	**OC8.4.2**	**Safety Co-ordinators**			
4.3.1	OC8.4.2.1	In the SGC, ' The **Company** and every **User** shall have nominated persons (**"Safety Co-ordinator(s)"**) to be available to isolate and earth to a time scale agreed in the **Connection Agreement** to meet the time scale for repairs that would effect other **Users**. **Users** can use trained operators to switch out and make safe circuits before the nominated persons are available on site. **"Safety Co-ordinator(s)"** will be responsible for the co-ordination of safety pursuant to this **Operating Code** No.6. The **Safety Co-ordinator** requesting **Safety Precautions** will be referred to as the **"Requesting Safety Co-ordinator"** and the **Safety Co-ordinator** being requested and implementing the **Safety Precautions** will be referred to as the **"Implementing Safety Co-ordinator"**.'	In the EWGC, ' For each **Connection Point**, NGC and each User will at all times have nominated and available a person or persons ("**Safety Co-ordinator**(s)") to be responsible for the co-ordination of **Safety Precautions** when work is to be carried out on a **System** which necessitates the provision of **Safety Precautions** on **HV Apparatus** pursuant to **OC8** . A **Safety Co-ordinator** may be responsible for the co-ordination of safety on **HV Apparatus** at more than one **Connection Point**.'	EWGC OC8 has Safety Co-ordinators available 'at all times' whereas the SGC OC6 merely states that they 'be available'. This is proposed as a regional difference. SGC OC6 makes specific reference to Users being able to switch out and make safe circuits. EWGC OC8 does not address the	Changed to GB-ise. A regional difference is proposed based on the drafting in SGC OC6 4.3.1 for the timescale in which the nominated representative is available in Scotland.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				switching out or making safe of circuits. This has not been included as a regional difference as it appears to be outside the scope of OC8 which applies to already de-energised assets. Views are invited on whether such arrangements as are specified in SGC OC6 could be dealt with in Local Safety Instructions or Connection Agreements. SGC OC6 includes the	

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				definition of 'Requesting Safety Co-ordinator' this is in the glossary and definitions in the EWGC. The definition of Implementing Safety Co-ordinator in the SGC is separately given in the glossary and definitions.	
4.3.2 & 4.3.3	OC8.4.2.2	In the SGC, ' Each **User** shall, prior to being connected to the **Transmission System**, give notice in writing to the **Company** of its **Safety Co-ordinator(s)** and will update the written notice yearly and whenever there is a change to the identity of its **Safety Co-ordinators** or to the **Connection Points**.' 'The **Company** will, at the time of a **User**	**In the GBGC,'** **For safety co-ordination in England and Wales, each Safety Co-ordinator shall be** authorised by **NGC** or a **User,** as the case may be, as competent to carry out the functions set out in **OC8** to achieve **Safety From The System.** Confirmation from the **System Operator** ~~**NGC**~~ or a **User**, as the case may be, that its **Safety Co-ordinator(s)**	EWGC CC.5.2(g) provides for the User to write to NGC that 'Safety Co-ordinators acting on its behalf are authorised and	EWGC CC5.2(g) was extended to GB and therefore OC8.4.2.2 is changed to GB-ise it and add the regional

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		being connected to the **Transmission System** give notice in writing to that **User** of the identity of its **Safety Co-ordinator(s)** and will update the written notice whenever there is a change to the **Connection Points** or **Safety Co-ordinators**.'	as a group are so authorised is dealt with in CC.5.2. Only persons with such authorisation will carry out the provisions of **OC8**. For safety co-ordination in Scotland, each Safety Co-ordinator shall be authorised by the Relevant Transmission Licensee or a User, as the case may be, as competent to carry out the functions set out in OC8 to achieve Safety From The System. Confirmation from the Relevant Transmission Licensee or a User, as the case may be, that its Safety Co-ordinator(s) as a group are so authorised is dealt with in CC.5.2. Only persons with such authorisation will carry out the provisions of OC8. Each User shall, prior to being connected to the **Transmission System**, give notice in writing to the **Relevant Transmission Licensee** of its **Safety Co-ordinator(s)** and will update the written notice yearly and whenever there is a change to the identity of its **Safety Co-ordinators** or to the **Connection Points** and the **Relevant Transmission Licensee** will, at the time of a **User** being connected to the **Transmission System** give notice in writing	competent'. In Scotland, the User and the company exchange lists of names. In SGC CC 6.1.2(g) the User provides a list of persons appointed by the User to be responsible. A regional difference was proposed in the CC mini-drafting consultation to reflect this. SGC OC6 4.3.2 and 4.3.3 reflect the SGC CC and are therefore also proposed as a regional	difference. The drafting for the regional difference is taken directly from the SGC. Note re drafting: the entire paras are intended to apply 'In England and Wales' and 'In Scotland' respectively.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
			to that **User** of the identity of its **Safety Co-ordinator(s)** and will update the written notice whenever there is a change to the **Connection Points** or **Safety Co-ordinators.**'	difference.	
n/a	OC8.4.2.3	In the GBGC, 'Contact between **Safety Co-ordinators** will be made via normal operational channels, and accordingly separate telephone numbers for **Safety Co-ordinators** need not be provided. For safety co-ordination in England and Wales, at the time of making contact, each party will confirm that they are authorised to act as a **Safety Co-ordinator**, pursuant to **OC8**.'		Propose a regional difference to second part, not required in Scotland because of 4.3.2/4.3.3.	Regional difference proposed.
4.3.4	OC8.4.2.4	'Pursuant to this **Operating Code** the **Safety Co-ordinator(s)** for each of **the Company** and a **User** relating to a place where **Safety Precautions** are required will contact each other, prior to the commencement of work, to co-ordinate these **Safety Precautions**.'	'If work is to be carried out on a **System**, or on equipment of ~~**NGC**~~**the System Operator** or the **Relevant Transmission Licensee** or a User near to a System, as provided in this OC8, which necessitates the provision of **Safety Precautions** on **HV Apparatus** in accordance with the provisions of **OC8**, the **Requesting Safety Co-ordinator** who requires the **Safety Precautions** to be provided shall contact the relevant **Implementing Safety Co-ordinator** to co-ordinate the establishment of the **Safety Precautions**.'	EWGC changed in revision 12 to include working 'near to', otherwise considered to be equivalent.	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
4.4	**OC8.4.3**	**RISSP**			
4.4.1	OC8.4.3.1	In the SGC, ‘ **Operating Code** No.6 utilises a **Record of Inter-System Safety Precautions** to record the implementation of **Safety Precautions**.’	In the GBGC, ‘ **OC8** sets out the procedures for utilising the **Record of Inter-System Safety Precautions** ("**RISSP**"), which will be used except where dealing with equipment in proximity to the other’s System as provided in OC8.8. Sections OC8.4 to OC8.7 inclusive should be read accordingly.’	Equivalent except for version 12 amendments.	None.
4.4.2	OC8.4.3.2	In the SGC, ‘ Each **User** and the **Company** will use the format of the **RISSP** set out in Appendix A and B to this **Operating Code,** or any other format which may be agreed between the **Company** and the **Users** from time to time. The form set out in Appendix A shall be used when a Party is the **Requesting Safety Co-ordinator** and is designated as **"RISSP-R",** and that in Appendix B shall be used when a Party is the **Implementing Safety Co-ordinator** and is designated as **"RISSP-I"**).’	In the GBGC, ‘ ~~**NGC**~~**Safety Coordinators** for the **Transmission** System will use the format of the **RISSP** forms set out in Appendix A and Appendix B to **OC8.** That set out in Appendix A and designated as **"RISSP-R",** shall be used when ~~**NGC**~~the **Safety Coordinator** for the **Transmission System** is the **Requesting Safety Co-ordinator,** and that in Appendix B and designated as **"RISSP-I",** shall be used when the **Safety Coordinator** for the **Transmission System** ~~**NGC**~~is the **Implementing Safety Co-ordinator.** Proformas of **RISSP-R** and **RISSP-I** will be provided for use by	EWGC separates requirements for NGC and Users. Current Scottish RISSP is the same format as EWGC but SGC provides for other formats to be agreed. Some instances of the	Changed to GB-ise. Regional difference for RISSP formats, drafting taken from SGC OC6 4.4.2 but amended to reflect changed context.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
			~~NGC~~**Safety Coordinators** for the **Transmission System**~~staff~~**.** For safety co-ordination in Scotland, **Safety Co-ordinators** for the **Transmission** System may instead use any other format which may be agreed between the **Relevant Transmission Licensee** and the **User** from time to time.'	Companies adopting User formats. Propose regional difference of 'any other format' by agreement. The EWGC provision is split between the Transmission side and the User side and so this regional difference appears in OC8.4.3.2 & 3.	
	OC8.4.3.3		In the GBGC,' For safety co-ordination in England and Wales: (a) **Users** may either adopt the format referred to in OC8.4.3.2, or use an equivalent format, provided that it includes	See OC8.4.3.2 above.	Regional difference for RISSP formats, drafting taken from SGC OC6 4.4.2

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
			sections requiring insertion of the same information and has the same numbering of sections as RISSP-R and RISSP-I as set out in Appendices A and B respectively. (b) Whether **Users** adopt the format referred to in OC8.4.3.2, or use the equivalent format as above, the format may be produced and held in, and retrieved from an electronic form by the **User**. (c) Whichever method **Users** choose, each must provide proformas (whether in tangible or electronic form) for use by its staff.' For safety co-ordination in Scotland, **Users** may either adopt the format referred to in OC8.4.3.2 or any other format which may be agreed between the **Relevant Transmission Licensee** and the **User** from time to time.		but amended to reflect changed context.
n/a	OC8.4.3.4	In the EWGC, 'All references to RISSP-R and RISSP-I shall be taken as referring to the corresponding parts of the alternative forms or other tangible written or electronic records used by each **User** or Relevant Transmission Licensee.'		No equivalent in SGC but as the SGC seems	Changed to reproduce User position

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			to assume this, it is proposed that this can be applied across GB.	in Scotland.
n/a	OC8.4.3.5	In the GBGC, 'For safety co-ordination in England and Wales, RISSP-R will have an identifying number written or printed on it, comprising a prefix which identifies the location at which it is issued, and a unique (for each **User or** the **System Operator** ~~**NGC**~~, as the case may be) serial number consisting of four digits and the suffix "R".'	Not currently specified in the SGC. All Transmission Licensees currently have a different system and all provide unique RISSP identifiers (within their licensed areas). Propose as a regional difference for E&W.	Regional difference to apply only to E&W.
n/a	OC8.4.3.6	In the GBGC, ' For safety co-ordination in England and Wales:	Practice in Scotland is that prefixes are	Regional difference to apply only to

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		(a) In accordance with the timing requirements set out in CC.5.2 each **User** shall apply in writing to the ~~**NGC**~~ **System Operator** for ~~**NGC's**~~the **System Operator's** approval of its proposed prefix. (b) ~~**NGC**~~The **System Operator** shall consider the proposed prefix to see if it is the same as (or confusingly similar to) a prefix used ~~**NGC**~~ by the **System Operator** or another **User** and shall, as soon as possible (and in any event within ten days), respond in writing to the **User** with its approval or disapproval. (c) If ~~**NGC**~~the **System Operator** disapproves, it shall explain in its response why it has disapproved and will suggest an alternative prefix. (d) If ~~**NGC**~~the **System Operator** has disapproved, then the **User** shall either notify ~~**NGC**~~the **System Operator** in writing of its acceptance of the suggested alternative prefix or it shall apply in writing to ~~**NGC**~~the **System Operator** with revised proposals and the above procedure shall apply to that application.'		allocated by the Company.	E&W.
n/a	OC8.4.3.7	In the GBGC, 'For safety co-ordination in England and Wales, the prefix allocation will be periodically circulated by ~~**NGC**~~the **System Operator** to all **Users,** for information purposes, using a National Grid Safety Circular in the form set out in Appendix D.'		Propose in England and Wales.	Regional difference to apply only to E&W.
4.4.3	OC8.5.4.2	In the SGC, ' Where **Safety Precautions** are being provided to enable work to be carried out on both sides of the **Connection Point** a **RISSP** will need to be issued for each side of the **Connection Point** with **the Company**	In the GBGC,' Where **Safety Precautions** are being provided to enable work to be carried out on both sides of the **Connection Point** a **RISSP** will need to be issued for each side of the **Connection Point** with ~~**NGC**~~ **Safety**	Equivalent.	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		and the respective **User** each enacting the role of **Requesting Safety Co-ordinator**. This will result in a RISSP-R and a RISSP-I form being completed by each of the **Company** and the **User** with each **Safety Co-ordinator** issuing one **RISSP** number.'	**Co-ordinators** for the **Transmission System** and the respective **User's System** each enacting the role of **Requesting Safety Co-ordinator**. This will result in a RISSP-R and a RISSP-I form being completed by each of ~~**NGC**~~ the **Safety Co-ordinators** for the **Transmission System** and the **User's System**, with each **Safety Co-ordinator** issuing one **RISSP** number.		
4.5	**OC8.5**	**Agreement of Safety Precautions**	**Safety Precautions on HV Apparatus**		
	OC8.5.1		**Agreement of Safety Precautions**		
4.5.1	OC8.5.1.1	In the SGC,' The **Requesting Safety Co-ordinator** who requires **Safety Precautions** on another **System(s)** will contact the relevant **Implementing Safety Co-ordinator(s)** to agree the location of the **Safety Precautions** to be established. This agreement will be recorded in the respective **Safety Logs**.'	In the EWGC, ' The **Requesting Safety Co-ordinator** who requires **Safety Precautions** on another **System(s)** will contact the relevant **Implementing Safety Co-ordinator(s)** to agree the **Location** of the **Safety Precautions** to be established. This agreement will be recorded in the respective **Safety Logs**.'	Identical.	None.
4.5.2	OC8.5.1.2	'It is the responsibility of the **Implementing Safety Co-ordinator** to ensure that adequate **Safety Precautions** are established and maintained, on his and/or another **System**	'It is the responsibility of the **Implementing Safety Co-ordinator** to ensure that adequate **Safety Precautions** are established and maintained, on his and/or	Identical other than additional last sentence in EWGC see	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		connected to his **System**, to enable **Safety From The System** to be achieved on the **HV Apparatus** specified by the **Requesting Safety Co-ordinator** which is to be identified in Part 1.1 of the **RISSP**.'	another **System** connected to his **System**, to enable **Safety From The System** to be achieved on the **HV Apparatus**, specified by the **Requesting Safety Co-ordinator** which is to be identified in Part 1.1 of the **RISSP**. Reference to another **System** in this OC8.5.1.2 shall not include the **Requesting Safety Co-ordinator's System** which is dealt with in OC8.5.1.3.'	OC8.5.1.3.	
n/a	OC8.5.1.3		'When the **Implementing Safety Co-ordinator** is of the reasonable opinion that it is necessary for **Safety Precautions** on the **System** of the **Requesting Safety Co-ordinator**, other than on the **HV Apparatus** specified by the **Requesting Safety Co-ordinator,** which is to be identified in Part 1.1 of the **RISSP**, he shall contact the **Requesting Safety Co-ordinator** and the details shall be recorded in part 1.1 of the **RISSP** forms. In these circumstances it is the responsibility of the **Requesting Safety Co-ordinator** to establish and maintain such **Safety Precautions**.'	This is not currently specified in the SGC. GCEG did not identify any problems with applying this in Scotland.	None.
4.5.3	EWGC n/a (GBGC OC8.5.1.4)	In the SGC, ' The location of the **Safety Precautions** should be indicated on each **Users**	In the GBGC, ' In Scotland, the location of the **Safety Precautions** should be indicated on each	Each Control Centre will tag their diagram	Note Local Safety Instructions

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		Operational Diagram and labeled as per the **Local Safety Instructions** of each **User**.'	**User's** operational diagram and labeled as per the **local** instruc**tions** of each **User.'**	to show that Safety Precautions are in place.	has a different meaning in each code. Regional difference proposed for Scotland (GBGC 8.5.1.4), drafting taken from SGC OC6 4.5.3 except: 'local instructions' used in place of 'Local Safety Instructions'; Operational diagram is lower cased to avoid confusion with Operation Diagram and

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
					apostrophe added again to avoid confusion.
n/a	**EWGC OC8.5.1.4** **(GBGC OC8.5.1.5)**		**In the event of disagreement**		
4.6.1 & 4.8.2	EWGC OC8.5.1.4 (GBGC OC8.5.1.5)		In the GBGC, ' For safety co-ordination in England and Wales, in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, both shall be at the closest available points on the infeeds to the **HV Apparatus** on which **Safety From The System** is to be achieved as indicated on the **Operation Diagram**. For safety co-ordination in Scotland, in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, then the work shall not progress.'	See 4.6.1 and 4.8.2 below.	Regional difference proposed for Scotland based on SGC OC6 4.6.1 and 4.8.2.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
4.6		Agreement of Isolation			
4.6.1 & 4.6.2	n/a (see OC8.5.1)	In the SGC, ' The **Requesting Safety Co-ordinator** shall inform the **Implementing Safety Co-ordinator** of the circuit(s) on which **Safety From The System** is to be achieved. Agreement shall be reached on the location(s) at which **Isolation** is to be established on **the Implementing Safety Co-ordinator's System**. This agreement will be recorded in the respective **Safety Logs**. If agreement cannot be reached on the location of **Isolation** then the work shall not progress. The **Implementing Safety Co-ordinator** shall then inform the **Requesting Safety Co-ordinator** of the following. (a) for each **Location**, the identity (by means of circuit name, nomenclature and numbering position) of each point of **Isolation**; (b) whether **Isolation** is to be achieved by an **Isolating Device** in the isolating		These 'Agreement of Isolation' (and 'Agreement of Earthing' in SGC OC6 4.8) requirements in the SGC are additional to those in the EWGC, but appear to replicate in slightly more detail the 'Agreement of Safety Precautions' in both the SGC OC6 4.5 and GBGC 8.5.1. The only difference to the EWGC is	Propose a regional difference in GBGC OC8.5.1.5 for when agreement is not reached, drafting taken from SGC 4.6.1 and EWGC OC8.5.1.4.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		position or by an adequate physical separation.'		that the SGC further separates Isolation and Earthing and the position if agreement cannot be reached.	
4.7	OC8.5.2	Implementation of Isolation			
4.7.1	OC8.5.2.1	In the SGC, ' Following the agreement of the **Safety Precautions** in accordance with 4.5 the **Implementing Safety Co-ordinator** shall then establish the agreed isolation.'	In the GBGC, ' Following the agreement of the **Safety Precautions** in accordance with OC8.5.1 the **Implementing Safety Co-ordinator** shall then establish the agreed **Isolation**.'	Identical.	None.
4.7.2	OC8.5.2.2	'The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Isolation** has been established, and identify the **Requesting Safety Co-ordinator's HV Apparatus** up to the **Connection Point**, for which the **Isolation** has been provided. The confirmation shall specify: (a) for each **Location**, the identity (by means of **HV Apparatus** name,	'The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Isolation** has been established, and identify the **Requesting Safety Co-ordinator's HV Apparatus** up to the **Connection Point**, for which the **Isolation** has been provided. The confirmation shall specify: (a) for each **Location**, the identity (by means of **HV Apparatus** name,	Intro, (a) and (b) identical. (c) and (d) considered to be equivalent.	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		nomenclature and numbering or position as applicable) of each point of **Isolation**; (b) whether **Isolation** has been achieved by an **Isolating Device** in the isolating position or by an adequate physical separation; (c) where an **Isolating Device** has been used whether the isolating position is either: (i) immobilized and **Locked** with the **Safety Key** being secured in a **Key Safe** and the **Key Safe Key** being retained in safe custody; or (ii) maintained and/or secured in position by such other method which must be in accordance with the relevant parties **Safety Rules**; or (d) where adequate physical separation has been used that it will be in accordance with, and maintained by, the method set out in the **Safety Rules** of the **Company** or that **User**, as the case may be. The confirmation of **Isolation** shall be	nomenclature and numbering or position, as applicable) of each point of **Isolation**; (b) whether **Isolation** has been achieved by an **Isolating Device** in the isolating position or by an adequate physical separation; (c) where an **Isolating Device** has been used whether the isolating position is either : (i) maintained by immobilising and **Locking** the **Isolating Device** in the isolating position and affixing a **Caution Notice** to it. Where the **Isolating Device** has been **Locked** with a **Safety Key** that the **Safety Key** has been secured in a **Key Safe** and the **Key Safe Key** will be retained in safe custody; or (ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of **NGC** or that **User**, as the case may be; and (d) where an adequate physical separation		

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		recorded in the respective **Safety Logs**.	has been used that it will be in accordance with, and maintained by, the method set out in the **Local Safety Instructions of ~~NGC~~** the **System Operator** or the **Relevant Transmission Licensee** or that **User**, as the case may be, and, if it is a part of that method, that a **Caution Notice** has been placed at the point of separation. The confirmation of **Isolation** shall be recorded in the respective **Safety Logs**.'		
4.8.1		**Agreement of Earthing**			
4.8.1	OC8.5.2.3	In the SGC, ' Following the confirmation of **Isolation** being established by the **Implementing Safety Co-ordinator** and the necessary establishment of relevant **Isolation** on the **Requesting Safety Co-ordinators System**, the **Requesting Safety Co-ordinator** may then request the implementation of **Earthing** by the **Implementing Safety Co-ordinator.'**	In the GBGC, ' Following the confirmation of **Isolation** being established by the **Implementing Safety Co-ordinator** and the necessary establishment of relevant **Isolation** on the **Requesting Safety Co-ordinators System**, the **Requesting Safety Co-ordinator** may then request the implementation of **Earthing** by the **Implementing Safety Co-ordinator**, if agreed in section OC8.5.1.'	Equivalent. OC8.5.1 deals with both Isolation and Earthing.	None.
4.8.2 &	n/a	'If the **Requesting Safety Co-ordinator** requires **Earthing** he shall inform the		These 'Agreement of	Propose a regional

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
4.8.3	(see OC8.5.1)	Implementing **Safety Co-ordinator** of the circuit(s) on which **Safety From The System** is to be achieved and that **Earthing** is to be provided and they will need to reach agreement on the location(s) at which **Earthing** is to be established on the **Implementing Safety Co-ordinator's System**. This agreement will be recorded in the respective **Safety Logs**. If agreement cannot be reached on the location of earthing, the work shall not progress. The **Implementing Safety Co-ordinator** shall inform the **Requesting Safety Co-ordinator** of the following: (a) for each location the identity (by means of circuit name, nomenclature and numbering or position) of each point of **Earthing**; and type of **Earthing**; and (b) in respect of the **Earthing Device** used, whether it is immobilised and (where possible) locked'		Earthing' requirements in the SGC are additional to those in the EWGC, but appear to replicate in slightly more detail the 'Agreement of Safety Precautions' in SGC OC6 4.5 (and GBGC 8.5.1). The only difference to the EWGC is the approach taken when agreement on the location of isolation and earthing cannot be reached.	difference in GBGC 8.5.1.5 for when agreement is not reached on the location of isolation and earthing, drafting taken from SGC 4.8.2 and EWGC OC8.5.1.4.
4.9	OC8.5.3	Implementation of Earthing			

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
4.9.1	OC8.5.3.1	In the SGC, ' The **Implementing Safety Co-ordinator** shall then establish the agreed **Earthing**.'	In the GBGC, ' The **Implementing Safety Co-ordinator** shall then establish the agreed **Earthing**.'	Identical.	None.
4.9.2	OC8.5.3.2	'The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Earthing** has been established, and identify the **Requesting Safety Co-ordinator's HV Apparatus** up to the **Connection Point**, for which the **Earthing** has been provided. The confirmation shall specify: (a) for each **Location**, the identity (by means of **HV Apparatus** name, nomenclature and numbering or position, as is applicable) of each point of **Earthing**; and type of **Earthing**; (b) in respect of the **Earthing Device** used, whether it is: (i) immobilised and **Locked** in the earthing position. Where the **Earthing Device** has been **Locked** with a **Safety Key**, that the **Safety Key** has been secured in a **Key Safe** and the **Key Safe Key** will be retained in safe custody; or	'The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Earthing** has been established, and identify the **Requesting Safety Co-ordinator's HV Apparatus** up to the **Connection Point**, for which the **Earthing** has been provided. The confirmation shall specify: (a) for each **Location**, the identity (by means of **HV Apparatus** name, nomenclature and numbering or position, as is applicable) of each point of **Earthing**; and (b) in respect of the **Earthing Device** used, whether it is: (i) immobilised and **Locked** in the **Earthing** position. Where the **Earthing Device** has been **Locked** with a **Safety Key**, that the **Safety Key** has been secured in a **Key Safe** and the **Key Safe Key** will be retained in safe custody; or	Intro identical, (a) in the SGC also has 'type of earthing', (b)(i) identical, b(ii) equivalent, last sentence identical.	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		(ii) maintained and/or secured in position by such other method which must be in accordance with the relevant parties **Safety Rules**. The confirmation of **Earthing** shall be recorded in the respective **Safety Logs**.'	(ii) maintained and/or secured in position by such other method which is in accordance with the **Local Safety Instructions** of ~~**NGC**~~ the **System Operator** or the **Relevant Transmission Licensee** **or** that **User**, as the case may be. The confirmation of **Earthing** shall be recorded in the respective **Safety Logs**.'		
4.9.3	OC8.5.3.3	'The **Implementing Safety Co-ordinator** shall ensure that the established **Safety Precautions** are maintained until requested to be removed by the relevant **Requesting Safety Co-ordinator**.'	'The **Implementing Safety Co-ordinator** shall ensure that the established **Safety Precautions** are maintained until requested to be removed by the relevant **Requesting Safety Co-ordinator**.'	Identical.	None.
	OC8.5.4	**RISSP** Issue Procedure			
n/a	OC8.5.4.1	In the EWGC, 'Where **Safety Precautions** on another **System(s)** are being provided to enable work on the **Requesting Safety Co-ordinator's System**, before any work commences they must be recorded by a **RISSP** being issued. The **RISSP** is applicable to **HV Apparatus** up to the **Connection Point** identified in section 1.1 of the RISSP-R and RISSP-I forms.'		No SGC equivalent has been identified. No problems are envisaged on applying this generally but views are invited.	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
(4.4.3)	OC8.5.4.2	See above SGC OC6 4.4.3			Changed to GB-ise.
4.10	n/a	Recording of Safety Precautions			
4.10.1	OC8.5.4.3	In the SGC,' Following confirmation that all the agreed **Safety Precautions** have been established on the **System** of the **Implementing Co-ordinator**, the **Implementing Safety Co-ordinator** will record the details of the **Safety Precautions** established in parts 1.1 and 1.2 of his RISSP-I. Where **Earthing** was not requested part 1.2(b) of the RISSP-I will be completed with the words "not applicable" or "N/A".'	In the EWGC, ' Once the **Safety Precautions** have been established (in accordance with OC8.5.2 and OC8.5.3), the **Implementing Safety Co-ordinator** shall complete parts 1.1 and 1.2 of a RISSP-I form recording the details specified in OC8.5.1.3, OC8.5.2.2 and OC8.5.3.2. Where **Earthing** has not been requested, Part 1.2(b) will be completed with the words "not applicable" or "N/A". He shall then contact the **Requesting Safety Co-ordinator** to pass on these details.'	Equivalent	None.
4.10.2	OC8.5.4.3	In the SGC, 'The **Implementing Safety Co-ordinator** shall then contact the **Requesting Safety Co-ordinator** and confirm by reading out the details entered on parts 1.1 and 1.2 of RISSP-I.'			
4.10.3	OC8.5.4.4	In the SGC, ' The **Requesting Safety Co-ordinator** will then complete parts 1.1 and 1.2 of his RISSP-R with the precise details received from the **Implementing Safety Co-ordinator**,	In the EWGC,' The **Requesting Safety Co-ordinator** shall complete Parts 1.1 and 1.2 of the RISSP-R, making a precise copy of the details received. On completion, the **Requesting**	Equivalent.	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		and then read out all those details to the **Implementing Safety Co-ordinator.**	**Safety Co-ordinator** shall read the entries made back to the sender and check that an accurate copy has been made.		
	OC8.5.4.5	If both confirm that the details entered are the same, **the Requesting Safety Co-ordinator** shall issue the RISSP identifying number to **the Implementing Safety Co-ordinator** who shall ensure that the number is correctly entered on the RISSP-I. Each **Safety Co-ordinator** shall then complete and sign part 1.3 of their respective RISSPs and enter the time and date. Except when permitted for testing purposes under 4.11, no alteration to the **RISSP** documentation or isolation is permitted once the **RISSP** has been signed, otherwise the **RISSP** may only be cancelled.'	The **Requesting Safety Co-ordinator** shall then issue the number of the **RISSP**, taken from the RISSP-R, to the **Implementing Safety Co-ordinator** who will ensure that the number, including the prefix and suffix, is accurately recorded in the designated space on the RISSP-I form.	Equivalent.	None. Views are invited on whether RISSP in Scotland numbers have prefixes and suffixes or whether a regional difference is required.
	OC8.5.4.6		The **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** shall complete and sign Part 1.3 of the RISSP-R and RISSP-I respectively and then enter the time and date. When signed no alteration to the **RISSP** is permitted; the **RISSP** may only be cancelled.'	Equivalent except SGC refers to testing exception. On inspection of 4.11 this exception is not evident so this is not proposed as a regional	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				difference.	
4.10.4	OC8.5.4.7	The **Requesting Safety Co-ordinator** is then free to authorize work, but not testing. Where testing is to be carried out, the procedure set out below in 4.11 shall be implemented. The procedure to carry out the work is entirely an internal matter for the Party the **Requesting Co-ordinator** is representing.	The **Requesting Safety Co-ordinator** is then free to authorise work (including a test that does not affect the **Implementing Safety Co-ordinator's System**) in accordance with the requirements of the relevant internal safety procedures which apply to the **Requesting Safety Co-ordinator's System**. This is likely to involve the issue of safety documents or other relevant internal authorisations. Where testing is to be carried out which affects the **Implementing Safety Co-ordinator's System**, the procedure set out below in OC8.6 shall be implemented. '	Equivalent other than the reference to testing in the SGC. The EWGC permits testing that will not affect the Implementing Safety Co-ordinator's system and that all other testing must follow the procedures in OC8.6. The SGC requires all testing to be carried out under the provisions of SGC OC6 4.11 (equivalent to OC8.6). This is not proposed as a regional	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				difference and views are invited on whether this is a significant difference.	
	OC8.5.5	see SGC OC6 4.12 (below).			
4.11	OC8.6	Testing	TESTING AFFECTING ANOTHER **SAFETY CO-ORDINATOR'S SYSTEM**		
4.11.1	OC8.6.1	In the SGC, ' Where the **Requesting Safety Co-ordinator** wishes to authorise the carrying out of a test to which the procedures in this **Operating Code** apply he may not do so and the test will not take place unless the following procedures are followed and confirmation of completion has been recorded in the respective **Safety Logs**: (a) confirmation is obtained from the **Implementing Safety Co-ordinator** that no person is working on, or testing, or has been authorised to work on, or test, any **Plant** and/or **Apparatus** within the points of Isolation agreed for the proposed test, and will not be so	In the EWGC, ' The carrying out of the test may affect **Safety Precautions** on **RISSPs** or work being carried out which does not require a **RISSP**. Testing can, for example, include the application of an independent test voltage. Accordingly, where the **Requesting Safety Co-ordinator** wishes to authorise the carrying out of such a test to which the procedures in OC8.6 apply he may not do so and the test will not take place unless and until the steps in (a)-(c) below have been followed and confirmation of completion has been recorded in the respective **Safety Logs**:	Considered to be equivalent by GCEG. It is understood that the words mean the same although they are not very similar. Note don't have 'transfer of control' concept found in SGC 4.11.1 (c) in the EWGC. . A regional	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		authorised until the proposed test has been completed or cancelled and the **Requesting Safety Co-ordinator** has notified **the Implementing Safety Co-ordinator** of its completion (or cancellation) and thereby the cancellation of the requirements; (b) any other current **RISSPs** (except for the **RISSP** relating to the test which is proposed to be undertaken (Test **RISSP**)) which relate to the parts of the System in which the testing is to take place must have been cancelled in accordance with procedures set out in 4.12; (c) the **Implementing Safety Co-ordinator** agrees to transfer control of that part of the **System** between the points of **Isolation** identified in the Test **RISSP** which he controls, to the relevant Party's **Responsible Engineer/Operator** (as the case may be) carrying out the test. Any transfer of control should be recorded in the **Safety Log**.'	(a) confirmation must be obtained from the **Implementing Safety Co-ordinator** that: (i) no person is working on, or testing, or has been authorised to work on, or test, any part of its **System** or another **System(s)** (other than the **System** of the **Requesting Safety Co-ordinator**) within the points of **Isolation** identified on the **RISSP** form relating to the test which is proposed to be undertaken, and (ii) no person will be so authorised until the proposed test has been completed (or cancelled) and the **Requesting Safety Co-ordinator** has notified the **Implementing Safety Co-ordinator** of its completion (or cancellation); (b) any other current **RISSPs** which relate to the parts of the **System** in which the	difference is not proposed for this and views on this are invited.	

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
			testing is to take place must have been cancelled in accordance with procedures set out in OC8.5.5; (c) the **Implementing Safety Co-ordinator** must agree with the **Requesting Safety Co-ordinator** to permit the testing on that part of the **System** between the points of **Isolation** identified in the **RISSP** associated with the test and the points of **Isolation** on the **Requesting Safety Co-ordinator's System**. '		
4.11.2	OC8.6.2	In the SGC,' The **Requesting Safety Co-ordinator** will return control to **the Implementing Safety Co-ordinator** as soon as the test has been completed or cancelled. If prior to testing, removal of **Earthing** is necessary for the purposes of the test and this **Earthing** is not subsequently reapplied, the original **RISSP** must be cancelled immediately on completion of the testing in accordance with the procedure set out in 4.12. Any removal or re-application of **Earthing** must	In the EWGC' (a) The **Requesting Safety Co-ordinator** will inform the **Implementing Safety Co-ordinator** as soon as the test has been completed or cancelled and the confirmation shall be recorded in the respective **Safety Logs**. (b) When the test gives rise to the removal of **Earthing** which it is not intended to re-apply, the relevant **RISSP** associated	See 4.11.1 above.	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		be recorded in the **Safety Log**.'	with the test shall be cancelled at the completion or cancellation of the test in accordance with the procedure set out in either OC8.5.5 or OC8.5.6. Where the **Earthing** is re-applied following the completion or cancellation of the test, there is no requirement to cancel the relevant **RISSP** associated with the test pursuant to this OC8.6.2.'		
4.12	OC8.5.5	Cancellation	**RISSP** Cancellation Procedure		
4.12.1	OC8.5.5.1	In the SGC, ' When the **Requesting Safety Co-ordinator** decides that **Safety Precautions** are no longer required, he will contact the relevant Implementing **Safety Co-ordinator** to effect cancellation of the associated **RISSP**.'	In the EWGC, ' When the **Requesting Safety Co-ordinator** decides that **Safety Precautions** are no longer required, he will contact the relevant Implementing **Safety** Co-ordinator to effect cancellation of the associated **RISSP**.'	Identical	None
n/a	OC8.5.5.2		'The **Requesting Safety Co-ordinator** will inform the relevant **Implementing Safety Co-ordinator** of the **RISSP** identifying number (including the prefix and suffix), and agree it is the **RISSP** to be cancelled. '	Additional requirement in the EWGC, but no problems envisaged with making this	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
				generally applicable.	
4.12.2	OC8.5.5.3	'Each **Safety Co-ordinator** shall then complete and sign part 2 of their respective **RISSPs** and enter the time and date.'	'The **Requesting Safety Co-ordinator** and the relevant **Implementing Safety Co-ordinator** shall then respectively complete Part 2.1 of their respective RISSP-R and RISSP-I forms and shall then exchange details. The details being exchanged shall include their respective names and time and date. On completion of the exchange of details the respective **RISSP** is cancelled. The removal of **Safety Precautions** is as set out in OC8.5.5.4 and OC8.5.5.5.'	The EWGC has a more detailed requirement than the SGC. No issues were identified by GCEG in making the EWGC provision apply across GB.	None.
4.12.3	OC8.5.5.4	'Neither **Safety Co-ordinator** shall instruct the removal of any **Isolation** forming part of the **Safety Precautions** until it is confirmed to each by each other that all **Earthing** has been removed.'	'Neither **Safety Co-ordinator** shall instruct the removal of any **Isolation** forming part of the **Safety Precautions** as part of the returning of the **HV Apparatus** to service until it is confirmed to each by each other that every earth on each side of the **Connection Point**, within the points of isolation identified on the **RISSP**, has been removed or disconnected by the provision of additional **Points of Isolation**. '	The EWGC has a more detailed requirement than the SGC; no issues identified by GCEG in making the EWGC provision GB applicable.	None.
4.12.4	OC8.5.5.5	Subject as provided in (4.12.3) the **Implementing Safety Co-ordinator** is then	Subject to the provisions in OC8.5.5.4, the **Implementing Safety Co-ordinator** is then	Equivalent.	None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		free to arrange the removal of the **Safety Precautions**, the procedure to achieve that being entirely an internal matter for the Party the **Implementing Safety Co-ordinator** is representing. The only situation in which any **Safety Precautions** may be removed without first canceling the **RISSP** in accordance with (4.12) is when **Earthing** is removed in the situation envisaged in 4.11.2.	free to arrange the removal of the **Safety Precautions**, the procedure to achieve that being entirely an internal matter for the party the **Implementing Safety Co-ordinator** is representing. The only situation in which any **Safety Precautions** may be removed without first cancelling the **RISSP** in accordance with OC8.5.5 or OC8.5.6 is when **Earthing** is removed in the situation envisaged in OC8.6.2(b).		
n/a	OC8.5.6	**RISSP** Change Control			
		Nothing in this OC8 prevents ~~**NGC**~~ **Safety Coordinators** for the **Transmission System** and **User~~s~~'s System** agreeing to a simultaneous cancellation and issue of a new **RISSP**, if both agree. It should be noted, however, that the effect of that under the relevant **Safety Rules** is not a matter with which the **Grid Code** deals.		EWGC provides a point of clarification, no issue identified in making GB applicable.	Changed to GB-ise.
n/a	OC8.7	EMERGENCY SITUATIONS			
	OC8.7.1	In the GBGC' There may be circumstances where **Safety Precautions** need to be established in relation to an unintended electrical connection or situations where there is an unintended risk of electrical connection between the ~~**NGC**~~ **Transmission System** and a **User's System**, for example resulting from an incident where one line becomes attached or unacceptably close to another.'		GCEG considered the provisions in OC8.7 to be sensible provisions	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			which could be applied to GB. Invite views.	
	OC8.7.2	'In those circumstances, if both~~NGC~~ the **Safety Coordinator** for the **Transmission System** and the ~~respective~~**Safety Coordinator** for the **User**'s System agree, the relevant provisions of OC8.5 will apply as if the electrical connections or potential connections were, solely for the purposes of this OC8, a **Connection Point**.'	See 8.7.1 above.	Changed to GB-ise.
	OC8.7.3	'(a) The relevant **Safety Co-ordinator** shall be that for the electrically closest existing **Connection Point** to that **User's System** or such other local **Connection Point** as may be agreed between~~NGC~~ **Safety Coordinators** for the **Transmission System** and the **User**'s System, with discussions taking place between the relevant local **Safety Co-ordinators**. The **Connection Point** to be used shall be known in this OC8.7.3 as the "relevant **Connection Point**". (b)The **Local Safety Instructions** shall be those which apply to the relevant **Connection Point**. (c)The prefix for the **RISSP** will be that which applies for the relevant **Connection Point.'**	See 8.7.1 above.	Changed to GB-ise.
n/a	OC8.8	**SAFETY PRECAUTIONS RELATING TO WORKING ON EQUIPMENT NEAR TO THE HV SYSTEM** In the EWGC' OC8.8 applies to the situation where work is to be carried out at a **User's Site** or a **NGC Site** (as the case may be) on equipment of the **User** or **NGC** as the case may be, where the	OC8.8 was inserted to the EWGC at revision 12 (November 2003). GCEG	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
		work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System**. It does not apply to other situations to which OC8 applies. In this part of OC8, a **Permit for Work for proximity work** is to be used, rather then the usual **RISSP** procedure, given the nature and effect of the work, all as further provided in the OC8.8.'	considered the provisions in OC8.8 to be sensible provisions which could be applied to GB. Views are invited on this matter	
	OC8.8.1	Agreement of **Safety Precautions**		
	OC8.8.1.1	'The **Requesting Safety Co-ordinator** who requires **Safety Precautions** on another **System(s)** when work is to be carried out at a **User's Site** or a **NGC Site** (as the case may be) on equipment of the **User** or **NGC**, as the case may be, where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System** will contact the relevant **Implementing Safety Co-ordinator(s)** to agree the Location of the **Safety Precautions** to be established, having as part of this process informed the **Implementing Safety Co-ordinator** of the equipment and the work to be undertaken. The respective **Safety Co-ordinators** will ensure that they discuss the request with their authorised site representative and that the respective authorised site representatives discuss the request at the **Connection Site**. This agreement will be recorded in the respective **Safety Logs**.'		Changed to GB-ise.
	OC8.8.1.2	'It is the responsibility of the **Implementing Safety Co-ordinator**, working with his authorised site representative as appropriate, to ensure that adequate **Safety Precautions** are established and maintained, on his and/or another **System** connected to his **System**, to enable **Safety From The System** to be achieved for work to be carried out at a **User's Site** or a **NGC Site** (as the case may be) on equipment and in relation to work which is to be		Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
		identified in the relevant part of the **Permit for Work for proximity work** where the work or equipment is near to **HV Apparatus** of the **Implementing Safety Co-ordinator's System** specified by the **Requesting Safety Co-ordinator**. Reference to another **System** in this OC.8.8.1.2 shall not include the **Requesting Safety Co-ordinator's System**.'		
	OC8.8.1.3	In the GBGC, ' In the event of disagreement For safety co-ordination in England and Wales, in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, both shall be at the closest available points on the infeeds to the **HV Apparatus** near to which the work is to be carried out as indicated on the **Operation Diagram**. For safety co-ordination in Scotland, in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, then the work shall not progress.'	Propose a regional difference to reflect similar requirements in SGC OC6 4.6.1 and 4.8.2.	Proposed a regional difference.
	OC8.8.2	Implementation of **Isolation and Earthing**		
	OC8.8.2.1	In the EWGC, ' Following the agreement of the **Safety Precautions** in accordance with OC8.8.1 the **Implementing Safety Co-ordinator** shall then establish the agreed **Isolation** and (if required) **Earthing**.'		None.
	OC8.8.2.2	'The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Isolation** and (if required) **Earthing** has been established.'		None.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
	OC8.8.2.3	'The **Implementing Safety Co-ordinator** shall ensure that the established **Safety Precautions** are maintained until requested to be removed by the relevant **Requesting Safety Co-ordinator**.'		None.
	OC8.8.3	**Permit for Work for proximity work** Issue Procedure		
	OC8.8.3.1	In the EWGC, ' Where **Safety Precautions** on another **System(s)** are being provided to enable work to be carried out at a **User's Site** or **NGC Site** (as the case may be) on equipment where the work or equipment is in proximity to **HV Apparatus** of the **Implementing Safety Co-ordinator**, before any work commences they must be recorded by a **Permit for Work for proximity work** being issued. The **Permit for Work for proximity work** shall identify the **Implementing Safety Co-ordinator's HV Apparatus** in proximity to the required work '		Changed to GB-ise.
	OC8.8.3.2	'Once the **Safety Precautions** have been established (in accordance with OC8.8.2), the **Implementing Safety Co-ordinator** shall agree to the issue of the **Permit for Work for proximity work** with the appropriately authorised site representative of the **Requesting Safety Co-ordinator's Site**. The **Implementing Safety Co-ordinator** will inform the **Requesting Safety Co-ordinator** of the **Permit for Work for proximity work** identifying number.'		None.
	OC8.8.3.3	'The appropriately authorised site representative of the **Implementing Safety Co-ordinator** shall then issue the **Permit for Work for proximity work** to the appropriately auhorised site representative of the **Requesting Safety Co-ordinator**. The **Permit for Work for**		None.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
		proximity work will in the section dealing with the work to be carried out, be completed to identify that the work is near the **Implementing Safety Co-ordinator's HV Apparatus.** No further details of the **Requesting Safety Co-ordinator's** work will be recorded, as that is a matter for the **Requesting Safety Co-ordinator** in relation to his work.'		
	OC8.8.3.4	'The **Requesting Safety Co-ordinator** is then free to authorise work in accordance with the requirements of the relevant internal safety procedures which apply to the **Requesting Safety Co-ordinator's Site**. This is likely to involve the issue of safety documents or other relevant internal authorisations.'		None.
	OC8.8.4	**Permit for Work for proximity work** Cancellation Procedure		
	OC8.8.4.1	In the EWGC, 'When the **Requesting Safety Co-ordinator** decides that **Safety Precautions** are no longer required, he will contact the relevant **Implementing Safety Co-ordinator** to effect cancellation of the associated **Permit for Work for proximity work**.'		None.
	OC8.8.4.2	'The **Requesting Safety Co-ordinator** will inform the relevant **Implementing Safety Co-ordinator** of the **Permit for Work for proximity work** identifying number, and agree that the **Permit for Work for proximity work** can be cancelled. The cancellation is then effected by the appropriately authorised site representative of the **Requesting Safety Co-ordinator** returning the **Permit for Work for proximity work** to the appropriately authorised site representative of the **Implementing Safety Co-ordinator**.'		None.
	OC8.8.4.3	'The **Implementing Safety Co-ordinator** is then free to arrange the removal of the **Safety**		None.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	Changes from EWGC to GBGC
		Precautions, the procedure to achieve that being entirely an internal matter for the party the **Implementing Safety Co-ordinator** is representing.'			
4.13	OC8.9	LOSS OF INTEGRITY OF **SAFETY PRECAUTIONS**			
4.13.1	OC8.9.1	In the SGC, ' In any instance when any Safety Precautions may be ineffective for any reason the Implementing Safety Co-ordinator shall inform the Requesting Safety Co-ordinator without delay of that being the case and, if requested, of the reasons why.'	In the EWGC, ' In any instance when any **Safety Precautions** may be ineffective for any reason the relevant **Safety Co-ordinator** shall inform the other **Safety Co-ordinator(s)** without delay of that being the case and, if requested, of the reasons why.'	Equivalent.	None.
4.14	OC8.10	SAFETY LOG			
4.14.1	OC8.10.1	In the SGC, ' Each Safety Co-ordinator shall maintain a Safety Log which shall be a chronological record of all messages relating to safety co-ordination under this Operating Code sent and received by the Safety Co-ordinator(s). The Safety Log must be retained for a period of not less than six years.'	In the GBGC, ' ~~**NGC**~~ **Safety Coordinators** for the **Transmission System** and **User~~s~~** shall maintain **Safety Logs** which shall be a chronological record of all messages relating to safety co-ordination under **OC8** sent and received by the **Safety Co-ordinator(s)**. For safety co-ordination in England and Wales, the **Safety Logs** must be retained for a period of not less than one year. For safety co-ordination in Scotland, the **Safety Logs** must be retained for a	Propose regional difference to reflect existing difference.	Changed to GB-ise. Regional difference proposed.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
		period of not less than six years.		
App A	App A	RISSP-R format	The RISSP-R forms are very similar. Views are invited on whether it is necessary to have two forms specified in this Appendix.	Changed to GB-ise.
App B	App B	RISSP-I format	The RISSP-I forms are very similar. Views are invited on whether it is necessary to have two forms specified in this Appendix.	Changed to GB-ise.
App C.1	App C1	RISSP Issue Process	Appendix C1 is a diagrammatic representation of the RISSP Issue Process. The EWGC diagram is	None.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			more detailed than that in the SGC. It would seem appropriate to adopt the EWGC version as it reflects the description set out in the operating code.	
App C.2	App C2	Testing Process	Appendix C2 is a diagrammatic representation of the Testing Process. The EWGC diagram is more detailed than that in the SGC. It would seem appropriate to adopt the EWGC version as it reflects the description set	None.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			out in the operating code.	
App C.3	App C3	RISSP Cancellation Process	Appendix C3 is a diagrammatic representation of the RISSP Cancellation Process. The EWGC diagram is more detailed than that in the SGC. It would seem appropriate to adopt the EWGC version as it reflects the description set out in the operating code.	None.
n/a	App C4	Process for working near to System Equipment	Appendix C4 is a diagrammatic representation of the Process for Working	None.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			near to System Equipment. There is no equivalent in the SGC. .	
n/a	App D	Format for National Grid Safety Circular	Only used in E&W.	None. Views are invited on whether this format is used for other (more general) purposes (as might be implied by the note at the end of the circular) than that specified (circulating RISSP prefix allocations).
n/a	App E	Form of Transmission Permit for Work	There is no equivalent to Appendix E in the SGC. Views	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions	Comment	Changes from EWGC to GBGC
			are invited on whether a separate form will be required for each Transmission Licensee.	

SGC	EWGC	GBGC	Comment
From Glossary and Definitions, not specifically defined in SGC OC6. **HV:** A voltage exceeding 1000 volts. **Apparatus:** All equipment in which electrical conductors are used, supported or of which they may form a part.	From OC8.1.5.2: (b) "**HV Apparatus**" means **High Voltage** electrical circuits forming part of a **System**, on which **Safety From The System** may be required or on which **Safety Precautions** may be applied to allow work to be carried out on a **System**.	OC8.1.7.2 as EWGC OC8.1.5.2 drafting.	See discussion under 'High Voltage'.
From SGC OC6 4.2: (1) **Isolation** from the remainder of the **System** of **Plant** and/or **Apparatus**, including from **Low Voltage** connections which may act as infeeds, either by: (a) an **Isolating Device** maintained in an isolating position. The isolating position must either be:	From EWGC OC8.1.5.2: (2) "**Isolation**" means the disconnection of **Apparatus** from the remainder of the **System** in which that **Apparatus** is situated by either of the following: (a) an **Isolating Device** maintained in an isolating position. The isolating position must either be:	From GBGC OC8.1.7.2: (2) "**Isolation**" means the disconnection of **Apparatus** from the remainder of the **System** in which that **Apparatus** is situated by either of the following: (a) an **Isolating Device** maintained in an isolating position. The isolating position must either be: (i) maintained by immobilising	Note that precise wording of SGC 4.2 (1) first para is different to OC8.1.5.2(2) but no significant difference was identified at GCEG. SGC does not specify a Caution Notice in (a)(i) (note EWGC implies it's not mandatory in (b)) but does require details of a Caution Notices to be

SGC	EWGC	GBGC	Comment
(i) immobilised and **Locked** with the **Safety Key** being secured in a **Key Safe** and the **Key Safe Key** being retained in safe custody; or (ii) maintained and/or secured in position by such other method which must be in accordance with the relevant party' s Safety Rules; or	(i) maintained by immobilising and **Locking** the **Isolating Device** in the isolating position and affixing a **Caution Notice** to it. Where the **Isolating Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or (ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of **NGC** or that **User**, as the case may be; or (b) an adequate physical separation	and **Locking** the **Isolating Device** in the isolating position and affixing a **Caution Notice** to it. Where the **Isolating Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or (ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee** or that **User** as the case may be; or (b) an adequate physical separation which must be in accordance with and maintained by the method	included in the RISSP as appropriate (Appendix A 1.2). The EWGC (a) (i) second sentence, implies there are ways other than locking with a Safety Key. The SGC in (a) (ii) and (b) uses the 'relevant party's Safety Rules' rather than 'Local Safety Instructions' (see definition of Local Safety Instructions below).

SGC	EWGC	GBGC	Comment
(b) adequate physical separation in accordance with and maintained by the method set out in the **Safety Rules** of the **Company** or **User** as the case may be.	which must be in accordance with, and maintained by, the method set out in the **Local Safety Instructions** of **NGC** or that **User**, as the case may be, and, if it is a part of that method, a **Caution Notice** must be placed at the point of separation.	set out in the **Local Safety Instructions** and if it is part of that method, a **Caution Notice** must be placed at the point of separation.	
From SGC OC6 4.2: (2) Earthing by way of providing a connection between a conductor and earth by using an **Earthing Device**. This **Earthing Device** must either be: (a) applied and, where reasonably practicable, immobilised and **Locked** with the **Safety Key** being secured in a **Key Safe** and the **Key Safe Key** being retained in safe custody; or	From the EWGC OC8.1.5.2: (3) "**Earthing**" means a way of providing a connection between conductors and earth by an **Earthing Device** which is either: (i) immobilised and **Locked** in the earthing position. Where the **Earthing Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or (ii) maintained and/or secured	From the GBGC OC8.1.7.2: (3) "**Earthing**" means a way of providing a connection between conductors and earth by an **Earthing Device** which is either: (i) immobilised and **Locked** in the earthing position. Where the **Earthing Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody;	SGC (a) has 'applied and where reasonable practicable immobilised' whereas EWGC (i) has 'immobilised and Locked'. GCEG considered that any circumstance that might comply with the SGC (a) but not the EWGC (i). . It is considered that such circumstances would in any case be covered by EWGC (ii). The SGC has an additional sentence at the end, but this is similar to OC8.1.1.

SGC	EWGC	GBGC	Comment
(b) maintained and/or secured in position by such other method which must be in accordance with the relevant party' s **Safety Rules;** The extent of the **Safety Precautions** required are determined pursuant to this **Operating Code** No.6.	in position by such other method which must be in accordance with the **Local Safety Instructions** of **NGC** or that **User** as the case may be.	or (ii) maintained and/or secured in position by such other method which must be in accordance with the **Local Safety Instructions** of ~~**NGC**~~**the System Operator** or the **Relevant Transmission Licensee** or that **User** as the case may be.	
The following definitions are taken from the Glossary and Definitions sections of the Grid Codes.			
Apparatus All equipment in which electrical conductors are used, supported or of which they may form a part.	**Apparatus** Other than in **OC8**, means all equipment in which electrical conductors are used, supported or of which they may form a part. In **OC8** it means **High Voltage** electrical circuits forming part of a **System** on which **Safety Precautions** may be applied to allow work and/or testing to be carried out on a **System**.	As EWGC definition.	

SGC	EWGC	GBGC	Comment
Earthing The provision of a connection between a conductor and earth by using an **Earthing Device** which is applied and, where reasonably practicable, immobilized and locked with the key secured in a **Key Safe** and the **Key Safe Key** retained in safe custody.	**Earthing** A way of providing a connection between conductors and earth by an **Earthing Device** which is either: (a) Immobilised and **Locked** in the earthing position. Where the **Earthing Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody: or (b) maintained and/or secured in position by such other method which must be in accordance with the **Local Safety Instructions** of **NGC** or that **User**, as the case may be.	**Earthing** A way of providing a connection between conductors and earth by an **Earthing Device** which is either: (a) Immobilised and **Locked** in the earthing position. Where the **Earthing Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody: or (b) maintained and/or secured in position by such other method which must be in accordance with the **Local Safety Instructions** of ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee** or that **User** as the case may be.	Note this definition has been revised from GBGC D1 Glossary and Definitions.
Note **Earthing Device** is used in the definition of **Earthing** but is not defined).	**Earthing Device** A means of providing a connection between a conductor and earth being of adequate strength and capability.	As EWGC definition.	
High Voltage or **HV** A voltage exceeding 1000 volts.	**High Voltage or HV** A voltage exceeding 650 volts.	As EWGC definition.	Voltage difference not considered to be a

SGC	EWGC	GBGC	Comment
			significant issue and it is proposed to apply the EWGC definition GB wide.
Implementing Safety Coordinator The **Safety Co-ordinator** implementing **Safety Precautions**. (see also SGC OC6 4.3 ' …the Safety Co-ordinator being requested and implementing the Safety Precautions will be referred to as the "Implementing Safety Co-ordinator".'	**Implementing Safety Co-ordinator** The **Safety Co-ordinator** implementing **Safety Precautions.**	As EWGC definition.	
Isolation The electrical **Isolation** (**Disconnection**) of part of a **System** of **Plant** and/or **Apparatus** from the remainder of the **System** of **Plant** and/or **Apparatus**, including from **Low Voltage** infeeds, either by an **Isolating Device** in the isolating position and immobilised and **Locked** with the key being secured in a **Key Safe** and the **Key Safe Key** being retained in safe custody, or by adequate physical separation or sufficient gap.	**Isolation** The disconnection of **HV Apparatus** (as defined in OC8.1.5.2) from the remainder of the **System** in which that **HV Apparatus** is situated by either of the following: (a) an **Isolating Device** maintained in an isolating position. The isolating position must either be: (i) maintained by immobilising and **Locking** the **Isolating Device** in the isolating position and affixing a **Caution Notice** to it.	**Isolation** The disconnection of **HV Apparatus** (as defined in OC8.1.5.2) from the remainder of the **System** in which that **HV Apparatus** is situated by either of the following: (b) an **Isolating Device** maintained in an isolating position. The isolating position must either be: (i) maintained by immobilising and **Locking** the **Isolating Device** in the isolating	EWGC definition has been GB-ised.

SGC	EWGC	GBGC	Comment
	Where the **Isolating Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or (ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of **NGC** or the **User**, as the case may be; or (b) an adequate physical separation which must be in accordance with and maintained by the method set out in the **Local Safety Instructions** of **NGC** or the **User**, as the case may be.	position and affixing a **Caution Notice** to it. Where the **Isolating Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or (ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee** or that **User** as the case may be; or (b) an adequate physical separation which must be in accordance with and maintained by the method set out in the **Local Safety Instructions** of ~~**NGC**~~the **System Operator** or the **Relevant**	

SGC	EWGC	GBGC	Comment
		Transmission Licensee or that **User** as the case may be.	
Key Safe A device for the secure retention of keys.	**Key Safe** A device for the secure retention of keys.	Identical.	
Key Safe Key A key unique at the **Location** capable of operating a lock, other than a control lock, on a **Key Safe**.	**Key Safe Key** A key unique at a **Location** capable of operating a lock, other than a control lock, on a **Key Safe**.	Equivalent. As EWGC definition.	
Local Safety Instructions is used in SGC OC6 4.5.3 'The location of the **Safety Precautions** should be indicated on each **Users** Operational Diagram and labeled as per the **Local Safety Instructions** of each **User**.' However, Local Safety Instructions are not defined in the SGC glossary and definitions; they are thought to refer specifically to control centre rules for labeling operational diagrams.	**Local Safety Instructions** Instructions on each **User Site** and **NGC Site**, approved by the relevant **NGC** or **User's** manager, setting down the methods of achieving the objectives of **NGC's** or the **User's Safety Rules**, as the case may be, to ensure the safety of personnel carrying out work or testing on **Plant** and/or **Apparatus** on which his **Safety Rules** apply and, in the case of a **User**, any other document(s) on a **User Site** which contains rules with regard to maintaining or securing the isolating position of an **Isolating Device**, or maintaining a physical separation or maintaining or securing the position of an **Earthing Device**.	**Local Safety Instructions** For safety co-ordination in England and Wales, instructions on each **User Site** and ~~**NGC**~~ **Transmission Site**, approved by the relevant ~~**NGC**~~ **System Operator** or **User's** manager, setting down the methods of achieving the objectives of ~~**NGC's**~~ the **System Operator's** or the **User's Safety Rules**, as the case may be, to ensure the safety of personnel carrying out work or testing on **Plant** and/or **Apparatus** on which his **Safety Rules** apply and, in the case of a **User**, any other document(s) on a **User Site** which	Changed to 'GB-ise'. Views are invited on the interpretation of the proposed drafting in particular whether it is clear that in the absence of any particular Local Safety Instructions for a Connection Site the Safety Rules will apply or whether the definition should be amended to explicitly define that 'where no Local Safety Instructions exist the Local Safety Instructions will be the Safety Rules.' to reflect

SGC	EWGC	GBGC	Comment
		contains rules with regard to maintaining or securing the isolating position of an **Isolating Device**, or maintaining a physical separation or maintaining or securing the position of an **Earthing Device**. For safety co-ordination in Scotland**,** instructions on each **User Site** and **Transmission Site**, approved by the relevant **Relevant Transmission Licensee** or **User's** manager, setting down the methods of achieving the objectives of the **Relevant Transmission Licensee's** or the **User's Safety Rules**, as the case may be, to ensure the safety of personnel carrying out work or testing on **Plant** and/or **Apparatus** on which his **Safety Rules** apply and, in the case of a **User**, any other document(s) on a **User Site** which contains rules with regard to maintaining or securing the isolating position of an **Isolating Device**, or maintaining a physical separation or maintaining or securing the position of an **Earthing Device**.	that the SGC uses 'Safety Rules' where the EWGC uses 'Local Safety Instructions' e.g. OC6 4.2(1)(b) and EWGC OC8.1.5.2(2)(b).

SGC	EWGC	GBGC	Comment
Location Any place at which **Safety Precautions** are to be applied.	**Location** Any place at which **Safety Precautions** are to be applied.	Identical.	
Low Voltage or **LV** A voltage exceeding 50 volts but not exceeding 1000 volts.	**Low Voltage** or **LV** A voltage not exceeding 250 volts.	As EWGC definition.	Note EWGC also specifies Medium Voltage between 250V and 650V (which was proposed to apply on a GB basis in GBGCD1).
Company Site **Company** Means: in the **SPT** transmission area, **SP Transmission plc**,in the **S+S** transmission area**, Scottish Hydro-Electric Transmission Ltd**. **Site** A **Company** Site or **User's** Site as the case may be.	**NGC Site** Means a site owned (or occupied pursuant to a lease, licence or other agreement) by **NGC** in which there is a **Connection Point**. For the avoidance of doubt, a site owned by a **User** but occupied by **NGC** as aforesaid, is an **NGC Site**.	**Transmission Site** In England and Wales, ~~M~~means a site owned (or occupied pursuant to a lease, licence or other agreement) by ~~**NGC**~~ the **System Operator** in which there is a **Connection Point**. For the avoidance of doubt, a site owned by a **User** but occupied by ~~**NGC**~~ the **System Operator** as aforesaid, is a ~~**NGC**~~ **Transmission Site**. In Scotland, means a site owned (or occupied pursuant to a lease, licence or other agreement) by a **Relevant Transmission Licensee** in which there is a **Connection Point**. For the avoidance of doubt,	Changed to GB-ise.

SGC	EWGC	GBGC	Comment
		a site owned by a **User** but occupied by a **Relevant Transmission Licensee** as aforesaid, is a **Transmission Site**.	
Operation Diagrams Diagrams which are a schematic representation of the **Apparatus** at substations or **Power Stations** and identifying each separate item of **Apparatus** by name, nomenclature and numbering as appropriate.	**Operation Diagrams** Diagrams which are a schematic representation of the **HV Apparatus** and the connections to all external circuits at a **Connection Site**, incorporating its numbering, nomenclature and labelling.	Similar. As EWGC definition.	Note SGC does not qualify Apparatus with 'HV'.
Not used.	**Permit for Work for proximity work** A document issued by **NGC** or a **User** in accordance with its respective **Safety Rules** to enable work to be carried out in accordance with OC8.8 and which provides for **Safety Precautions** to be applied and maintained. An example format of **NGC's** permit for work is attached as Appendix E to **OC8**.	As EWGC definition.	
Not used.	**Point of Isolation** The point on **Apparatus** (as defined in OC8.1.5.2) at which **Isolation** is	As EWGC definition.	

SGC	EWGC	GBGC	Comment
	achieved.		
Requesting Safety Co-ordinator Has the meaning set out in **Operating Code** No 6 paragraph 4.3 (which is The **Safety Co-ordinator** requesting **Safety Precautions**.	**Requesting Safety Co-ordinator** The **Safety Co-ordinator** requesting **Safety Precautions**.	Identical.	
No equivalent definition. **('Responsible Engineer/Operator:** A **Company** or **User** Nominated Person to be responsible for **System** control.' Is used in a different context.	**Responsible Manager** A manager who has been duly authorised by a **User** or **NGC** to sign **Site Responsibility Schedules** on behalf of that **User** or **NGC**, as the case may be.	**Responsible Manager** For safety co-ordination in England and Wales, a manager who has been duly authorised by a **User** or ~~**NGC**~~ the **System Operator** to sign **Site Responsibility Schedules** on behalf of that **User** or ~~**NGC**~~ **the System Operator**, as the case may be. For safety co-ordination in Scotland, a manager who has been duly authorised by a **User** or the **Relevant Transmission Licensee** to sign **Site Responsibility Schedules** on behalf of that **User** or **the Relevant Transmission Licensee**, as the case may be.	Changed to GB-ise.

SGC	EWGC	GBGC	Comment
Safety Co-ordinator A person nominated by the **Company** or a **User** to be responsible for the co-ordination of **Safety Precautions** pursuant to **Operating Code**.	**Safety Co-ordinator** A person or persons nominated by **NGC** and each **User** to be responsible for the co-ordination of **Safety Precautions** at each **Connection Point** when work (which includes testing) is to be carried out on a **System** which necessitates the provision of **Safety Precautions** on **HV Apparatus** (as defined in OC8.1.5.2), pursuant to **OC8**.	**Safety Co-ordinator** A person or persons nominated by each **User** and the **System Operator** (in England and Wales) and by the relevant **Relevant Transmission Licensee** (in Scotland)~~and each **User**~~ to be responsible for the co-ordination of **Safety Precautions** at each **Connection Point** when work (which includes testing) is to be carried out on a **System** which necessitates the provision of **Safety Precautions** on **HV Apparatus** (as defined in OC8.1.5.2), pursuant to **OC8**.	
Safety From The System That condition which safeguards persons working on or testing **Plant** and/or **Apparatus** from the dangers which are inherent in the **System.**	**Safety From The System** That condition which safeguards persons when work is to be carried out on or near a **System** from the dangers which are inherent in the **System.**	Equivalent. As EWGC definition.	
Safety Key A key unique at the **Location**	**Safety Key** A key unique at the **Location** capable	Identical.	

SGC	EWGC	GBGC	Comment
capable of operating a lock which will cause an **Isolating Device,** and/or **Earthing Device** to be **Locked.**	of operating a lock which will cause an **Isolating Device** and/or **Earthing Device** to be **Locked**.		
Safety Precautions The application of **Isolation** and/or **Earthing**	**Safety Precautions** **Isolation** and/or **Earthing**	Equivalent. As EWGC definition.	
Safety Rules The safety rules or procedures of **ScottishPower** or of a **User** that seek to ensure that persons working on **Plant** ad/or **Apparatus** to which the rules apply are safeguarded from hazards arising from the **System**.	**Safety Rules** The rules of **NGC** or a **User** that seek to ensure that persons working on **Plant** and/or **Apparatus** to which the rules apply are safeguarded from hazards arising from the **System**.	**Safety Rules** The rules of ~~**NGC**~~ the **System Operator** (in England and Wales) and the **Relevant Transmission Licensee** (in Scotland) or a **User** that seek to ensure that persons working on **Plant** and/or **Apparatus** to which the rules apply are safeguarded from hazards arising from the **System**.	SGC definition appears to omit S+S.
System Any **User System** or the **Company Transmission System**, as the case may be.	**System** Any **User System** and/or the **NGC Transmission System**, as the case may be.	**System** Any **User System** and/or the ~~**NGC**~~ **Transmission System**, as the case may be.	Changed to GB-ise.
User Site Has the meaning set out in	**User Site** A site owned (or occupied pursuant to	**User Site** In England and Wales, ~~A~~a site	Changed to GB-ise.

SGC	EWGC	GBGC	Comment
Operating Code No 9 paragraph 4.1.(i) ' The **Company's Plant** and/or **Apparatus** on **Users' Sites** will have numbering and nomenclature on the basis of that used from time to time by the **Company**;'	a lease, licence or other agreement) by a **User** in which there is a **Connection Point**. For the avoidance of doubt, a site owned by **NGC** but occupied by a **User** as aforesaid, is a **User Site**.	owned (or occupied pursuant to a lease, licence or other agreement) by a **User** in which there is a **Connection Point**. For the avoidance of doubt, a site owned by the **System Operator** but occupied by a **User** as aforesaid, is a **User Site**. In Scotland, a site owned (or occupied pursuant to a lease, licence or other agreement) by a **User** in which there is a **Connection Point**. For the avoidance of doubt, a site owned by a **Relevant Transmission Licensee** but occupied by a **User** as aforesaid, is a **User Site**.	

Appendix 2 – Proposed GBGC OC8 drafting

OPERATING CODE NO.8

SAFETY CO-ORDINATION

CONTENTS

(This contents page does not form part of the Grid Code)

OPERATING CODE NO.8

SAFETY CO-ORDINATION

OC8.1 INTRODUCTION

OC8.1.1 It is recognised that **Relevant Transmission Licensees** are not required to comply with this Grid Code. Accordingly, whereas this Operating Code No.8 ("**OC8"**) refers to obligations which will in practice be performed by **Relevant Transmission Licensees** or the **Safety Co-ordinator** nominated by a **Relevant Transmission Licensee** in accordance with relevant obligations under the **STC**, for the avoidance of doubt all contractual liabilities arising in connection with such obligations shall exist between the **System Operator** and the relevant **User**. **Relevant Transmission Licensees** shall enjoy no enforceable rights hereunder. Where, but for the exclusion of third party rights, a **Relevant Transmission Licensee** would enjoy any rights under the **Grid Code** then the right in question is for the benefit of the **System Operator** and compliance with any relevant obligation will be enforceable by the **System Operator** and not by any **Relevant Transmission Licensee**.

~~Operating Code No.8 ("~~**OC8**~~")~~ specifies the standard procedures to be used by ~~**NGC**~~the **System Operator**, **Relevant Transmission Licensees** and **Users** for the co-ordination, establishment and maintenance of necessary **Safety Precautions** when work is to be carried out on or near the **Transmission System** or the **System** of ~~**NGC** or~~ a **User** and when there is a need for **Safety Precautions** on **HV Apparatus** on the other's **System** for this work to be carried out safely.

In this **OC8** the term "work" includes testing, other than **System Tests** which are covered by **OC12**.

OC8.1.2 **OC8** also covers the co-ordination, establishment and maintenance of necessary safety precautions on the **Implementing Safety Co-ordinator's System** when work is to be carried out at a **User's Site** or a ~~**NGC**~~ **Transmission Site** (as the case may be) on equipment of the **User** or ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee** as the case may be where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System**.

OC8.1.3 **OC8** does not apply to the situation where **Safety Precautions** need to be agreed solely between **Users**.

OC8.1.4 **OC8** does not seek to impose a particular set of **Safety Rules** on ~~**NGC**~~ **Transmission Licensees** and **Users**~~:~~. ~~the~~ For safety co-ordination in England and Wales, the **Safety Rules** to be adopted and used by the **System Operator**~~NGC~~ and each **User** shall be those chosen by each. For safety co-ordination in Scotland, the **Safety Rules** to be adopted and used by the **Relevant Transmission Licensee** and each **User** shall be those chosen by each.

OC8.1.5 **Site Responsibility Schedules** document the **Safety Co-ordinators** for each site.

OC8.1.6 For sites in Scotland, the **Relevant Transmission Licensee** may agree detailed site-specific operational procedures with **Users** for the co-ordination, establishment and

maintenance of **Safety Precautions** instead of the **Record of Inter-System Safety Precautions ("RISSP")** procedure detailed in this **OC8**. Such operational procedures shall satisfy the requirements of paragraphs OC8.1.8, OC8.2.1, OC8.4.2, OC8.9, OC8.10 and Connection Conditions CC.7.2.

OC8.1.~~5~~7 Defined terms

OC8.1.~~5~~7.1 **Users** should bear in mind that in **OC8** only, in order that **OC8** reads more easily with the terminology used in ~~**NGC's** and~~ certain ~~**Users'**~~ **Safety Rules**, the term "**HV Apparatus**" is defined more restrictively and is used accordingly in **OC8**. **Users** should, therefore, exercise caution in relation to this term when reading and using **OC8**.

OC8.1.~~5~~7.2 In **OC8** only the following terms shall have the following meanings:

(1) "**HV Apparatus**" means **High Voltage** electrical circuits forming part of a **System**, on which **Safety From The System** may be required or on which **Safety Precautions** may be applied to allow work to be carried out on a **System**.

(2) "**Isolation**" means the disconnection of **Apparatus** from the remainder of the **System** in which that **Apparatus** is situated by either of the following:

(a) an **Isolating Device** maintained in an isolating position. The isolating position must either be:

(i) maintained by immobilising and **Locking** the **Isolating Device** in the isolating position and affixing a **Caution Notice** to it. Where the **Isolating Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or

(ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of ~~**NGC**~~ the **System Operator** or the **Relevant Transmission Licensee** or that **User**, as the case may be; or

(b) an adequate physical separation which must be in accordance with, and maintained by, the method set out in the **Local Safety Instructions** of ~~**NGC**~~ the **System Operator** or the **Relevant Transmission Licensee** or that **User**, as the case may be, and, if it is a part of that method, a **Caution Notice** must be placed at the point of separation.

(3) "**Earthing**" means a way of providing a connection between conductors and earth by an **Earthing Device** which is either:

(i) immobilised and **Locked** in the **Earthing** position. Where the **Earthing Device** is **Locked** with a **Safety Key**, the **Safety Key** must be secured in a **Key Safe** and the **Key Safe Key** must be retained in safe custody; or

(ii) maintained and/or secured in position by such other method which must be in accordance with the **Local Safety Instructions** of ~~**NGC**~~ the **System Operator** or the **Relevant Transmission Licensee** or that **User** as the case may be.

OC8.1.~~5~~7.3 For the purpose of the co-ordination of safety relating to **HV Apparatus** the term **"Safety Precautions"** means **Isolation** and/or **Earthing.**

OC8.2 OBJECTIVE

OC8.2.1 The objective of OC8 is to achieve:-

(i) **Safety From The System** when work on or near a **System** necessitates the provision of **Safety Precautions** on another **System** on **HV Apparatus** up to a **Connection Point**; and

(ii) **Safety From The System** when work is to be carried out at a **User's Site** or a ~~**NGC**~~ **Transmission Site** (as the case may be) on equipment of the **User** or ~~NGC~~ the **System Operator** or the **Relevant Transmission Licensee** where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System**.

OC8.2.2 A flow chart, set out in Appendix C, illustrates the process utilised in **OC8** to achieve the objective set out in OC8.2.1. In the case of a conflict between the flow chart and the provisions of the written text of **OC8**, the written text will prevail.

OC8.3 SCOPE

OC8.3.1 **OC8** applies to ~~**NGC**~~ the **System Operator** and to **Users**, which in OC8 means:-

(a) **Generators**;

(b) **Network Operators**; and

(c) **Non-Embedded Customers.**

The procedures for the establishment of safety co-ordination by ~~**NGC**~~the **System Operator** with **Externally Interconnected System Operators** are set out in **Interconnection Agreements** with each **Externally Interconnected System Operator**.

OC8.4 PROCEDURE

OC8.4.1 Approval of **Local Safety Instructions**

OC8.4.1.1 (a) For **Connection Sites** in England and Wales~~I~~ in accordance with the timing requirements of its **Bilateral Agreement**, each **User** will supply to the **System Operator**~~NGC~~ a copy of its **Local Safety Instructions** relating to its side of the **Connection Point** at each **Connection Site**.

For **Connection Sites** in Scotland in accordance with the timing requirements of its **Bilateral Agreement**, each **User** will supply to the **Relevant Transmission Licensee** a copy of its **Local Safety Instructions** relating to its side of the **Connection Point** at each **Connection Site**.

(b) For **Connection Sites** in England and Wales~~I~~ in accordance with the timing requirements of each **Bilateral Agreement**, the **System Operator**~~NGC~~ will

supply to each **User** a copy of its **Local Safety Instructions** relating to the ~~**NGC**~~ **Transmission** side of the **Connection Point** at each **Connection Site**.

For **Connection Sites** in Scotland in accordance with the timing requirements of each **Bilateral Agreement** the **Relevant Transmission Licensee** will supply to each **User** a copy of its **Local Safety Instructions** relating to the **Transmission** side of the **Connection Point** at each **Connection Site**.

(c) For **Connection Sites i**n England and Wales ~~P~~prior to connection the **System Operator** and the **User**~~each party~~ must have approved ~~the~~ each other's relevant **Local Safety Instructions** in relation to **Isolation** and **Earthing**.

For **Connection Sites** in Scotland prior to connection the **Relevant Transmission Licensee** and the **User** must have approved each other's relevant **Local Safety Instructions** in relation to **Isolation** and **Earthing**.

OC8.4.1.2 Either party may require that the **Isolation** and/or **Earthing** provisions in the other party's **Local Safety Instructions** affecting the **Connection Site** should be made more stringent in order that approval of the other party's **Local Safety Instructions** can be given. Provided these requirements are not unreasonable, the other party will make such changes as soon as reasonably practicable. These changes may need to cover the application of **Isolation** and/or **Earthing** at a place remote from the **Connection Site**, depending upon the **System** layout. Approval may not be withheld because the party required to approve reasonably believes the provisions relating to **Isolation** and/or **Earthing** are too stringent.

OC8.4.1.3 If, following approval, a party wishes to change the provisions in its **Local Safety Instructions** relating to **Isolation** and/or **Earthing**, it must inform the other party. If the change is to make the provisions more stringent, then the other party merely has to note the changes. If the change is to make the provisions less stringent, then the other party needs to approve the new provisions and the procedures referred to in OC8.4.1.2 apply.

OC8.4.2 **Safety Co-ordinators**

OC8.4.2.1 For each **Connection Point** in England and Wales**,** ~~**NGC**~~ the **System Operator** and each **User** will at all times have nominated and available a person or persons ("**Safety Co-ordinator(s)**") to be responsible for the co-ordination of **Safety Precautions** when work is to be carried out on a **System** which necessitates the provision of **Safety Precautions** on **HV Apparatus** pursuant to **OC8 .** A **Safety Co-ordinator** may be responsible for the co-ordination of safety on **HV Apparatus** at more than one **Connection Point**.

For each **Connection Point** in Scotland**,** the **Relevant Transmission Licensee** and each **User** will have nominated to be available, to a timescale agreed in the **Bilateral Agreement,** a person or persons ("**Safety Co-ordinator(s)**") to be responsible for the co-ordination of **Safety Precautions** when work is to be carried out on a **System** which necessitates the provision of **Safety Precautions** on **HV Apparatus** pursuant to **OC8.** A **Safety Co-ordinator** may be responsible for the co-ordination of safety on **HV Apparatus** at more than one **Connection Point**.

OC8.4.2.2 For safety co-ordination in England and Wales, ~~E~~each **Safety Co-ordinator** shall be authorised by ~~**NGC**~~the **System Operator** or a **User,** as the case may be, as competent to carry out the functions set out in **OC8** to achieve **Safety From The**

System. Confirmation from the **System Operator** ~~**NGC**~~ or a **User**, as the case may be, that its **Safety Co-ordinator(s)** as a group are so authorised is dealt with in CC.5.2. Only persons with such authorisation will carry out the provisions of **OC8**.

For safety co-ordination in Scotland, each **Safety Co-ordinator** shall be authorised by the **Relevant Transmission Licensee** or a **User,** as the case may be, as competent to carry out the functions set out in **OC8** to achieve **Safety From The System**. Confirmation from the **Relevant Transmission Licensee** or a **User**, as the case may be, that its **Safety Co-ordinator(s)** as a group are so authorised is dealt with in CC.5.2. Only persons with such authorisation will carry out the provisions of **OC8**. Each **User** shall, prior to being connected to the **Transmission System**, give notice in writing to the **Relevant Transmission Licensee** of its **Safety Co-ordinator(s)** and will update the written notice yearly and whenever there is a change to the identity of its **Safety Co-ordinators** or to the **Connection Points.** The **Relevant Transmission Licensee** will, at the time of a **User** being connected to the **Transmission System** give notice in writing to that **User** of the identity of its **Safety Co-ordinator(s)** and will update the written notice whenever there is a change to the **Connection Points** or **Safety Co-ordinators.**

OC8.4.2.3 Contact between **Safety Co-ordinators** will be made via normal operational channels, and accordingly separate telephone numbers for **Safety Co-ordinators** need not be provided. For safety co-ordination in England and Wales, ~~A~~at the time of making contact, each party will confirm that they are authorised to act as a **Safety Co-ordinator**, pursuant to **OC8**.

OC8.4.2.4 If work is to be carried out on a **System**, or on equipment of ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee** or a **User** near to a **System**, as provided in this **OC8,** which necessitates the provision of **Safety Precautions** on **HV Apparatus** in accordance with the provisions of **OC8**, the **Requesting Safety Co-ordinator** who requires the **Safety Precautions** to be provided shall contact the relevant **Implementing Safety Co-ordinator** to co-ordinate the establishment of the **Safety Precautions**.

OC8.4.3 **RISSP**

OC8.4.3.1 **OC8** sets out the procedures for utilising the ~~**Record of Inter-System Safety Precautions ("RISSP")**~~, which will be used except where dealing with equipment in proximity to the other's **System** as provided in **OC8.8**. Sections **OC8.4** to **OC8.7** inclusive should be read accordingly.

OC8.4.3.2 ~~**NGC**~~ **Safety Co-ordinators** for the **Transmission System** will use the format of the **RISSP** forms set out in Appendix A and Appendix B to **OC8**. That set out in Appendix A and designated as "RISSP-R", shall be used when ~~**NGC**~~ the **Safety Co-ordinator** for the **Transmission System** is the **Requesting Safety Co-ordinator**, and that in Appendix B and designated as "RISSP-I", shall be used when the **Safety Co-ordinator** for the **Transmission System** ~~**NGC**~~ is the **Implementing Safety Co-ordinator**. Proformas of RISSP-R and RISSP-I will be provided for use by ~~**NGC**~~ **Safety Co-ordinators** for the **Transmission System**~~staff~~. For safety co-ordination in Scotland, **Safety Co-ordinators** for the **Transmission System** may instead use any other format which may be agreed between the **Relevant Transmission Licensee** and the **User** from time to time.

OC8.4.3.3 For safety co-ordination in England and Wales:

(a) **Users** may either adopt the format referred to in OC8.4.3.2, or use an equivalent format, provided that it includes sections requiring insertion of the

same information and has the same numbering of sections as RISSP-R and RISSP-I as set out in Appendices A and B respectively.

(b) Whether **Users** adopt the format referred to in OC8.4.3.2, or use the equivalent format as above, the format may be produced and held in, and retrieved from an electronic form by the **User**.

(c) Whichever method **Users** choose, each must provide proformas (whether in tangible or electronic form) for use by its staff.

For safety co-ordination in Scotland, **Users** may either adopt the format referred to in OC8.4.3.2 or any other format which may be agreed between the **Relevant Transmission Licensee** and the **User** from time to time.

OC8.4.3.4 All references to RISSP-R and RISSP-I shall be taken as referring to the corresponding parts of the alternative forms or other tangible written or electronic records used by each **User** or **Relevant Transmission Licensee**.

OC8.4.3.5 For safety co-ordination iIn England and Wales, RISSP-R will have an identifying number written or printed on it, comprising a prefix which identifies the location at which it is issued, and a unique (for each **User** or ~~**NGC**~~the **System Operator**, as the case may be) serial number consisting of four digits and the suffix "R".

OC8.4.3.6 For safety co-ordination in England and Wales:

(a) In accordance with the timing requirements set out in CC.5.2 each **User** shall apply in writing to ~~**NGC**~~ the **System Operator** for ~~**NGC's**~~ the **System Operator's** approval of its proposed prefix.

(b) ~~**NGC**~~ The **System Operator** shall consider the proposed prefix to see if it is the same as (or confusingly similar to) a prefix used by the **System Operator** ~~**NGC**~~ or another **User** and shall, as soon as possible (and in any event within ten days), respond in writing to the **User** with its approval or disapproval.

(c) If ~~**NGC**~~ the **System Operator** disapproves, it shall explain in its response why it has disapproved and will suggest an alternative prefix.

(d) If ~~**NGC**~~ the **System Operator** has disapproved, then the **User** shall either notify ~~**NGC**~~ the **System Operator** in writing of its acceptance of the suggested alternative prefix or it shall apply in writing to the **System Operator**~~**NGC**~~ with revised proposals and the above procedure shall apply to that application.

OC8.4.3.7 For safety co-ordination in England and Wales, ~~T~~the prefix allocation will be periodically circulated by ~~**NGC**~~ the **System Operator** to all **Users,** for information purposes, using a National Grid Safety Circular in the form set out in Appendix D.

OC8.5 **SAFETY PRECAUTIONS** ON **HV APPARATUS**

OC8.5.1 Agreement of **Safety Precautions**

OC8.5.1.1 The **Requesting Safety Co-ordinator** who requires **Safety Precautions** on another **System(s)** will contact the relevant **Implementing Safety Co-ordinator(s)** to agree the **Location** of the **Safety Precautions** to be established. This agreement will be recorded in the respective **Safety Logs**.

OC8.5.1.2 It is the responsibility of the **Implementing Safety Co-ordinator** to ensure that adequate **Safety Precautions** are established and maintained, on his and/or another **System** connected to his **System**, to enable **Safety From The System** to be achieved on the **HV Apparatus**, specified by the **Requesting Safety Co-ordinator** which is to be identified in Part 1.1 of the **RISSP**. Reference to another **System** in this OC8.5.1.2 shall not include the **Requesting Safety Co-ordinator's System** which is dealt with in OC8.5.1.3.

OC8.5.1.3 When the **Implementing Safety Co-ordinator** is of the reasonable opinion that it is necessary for **Safety Precautions** on the **System** of the **Requesting Safety Co-ordinator**, other than on the **HV Apparatus** specified by the **Requesting Safety Co-ordinator,** which is to be identified in Part 1.1 of the **RISSP**, he shall contact the **Requesting Safety Co-ordinator** and the details shall be recorded in part 1.1 of the **RISSP** forms. In these circumstances it is the responsibility of the **Requesting Safety Co-ordinator** to establish and maintain such **Safety Precautions**.

OC8.5.1.4 In Scotland, the location of the **Safety Precautions** should be indicated on each **User's** operational diagram and labelled as per the local instructions of each **User**.

OC8.5.1.45 In the event of disagreement

For safety co-ordination in England and Wales, ~~I~~in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, both shall be at the closest available points on the infeeds to the **HV Apparatus** on which **Safety From The System** is to be achieved as indicated on the **Operation Diagram**.

For safety co-ordination in Scotland, in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, then the work shall not progress.

OC8.5.2 Implementation of **Isolation**

OC8.5.2.1 Following the agreement of the **Safety Precautions** in accordance with OC8.5.1 the **Implementing Safety Co-ordinator** shall then establish the agreed **Isolation**.

OC8.5.2.2 The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Isolation** has been established, and identify the **Requesting Safety Co-ordinator's HV Apparatus** up to the **Connection Point**, for which the **Isolation** has been provided. The confirmation shall specify:

(a) for each **Location**, the identity (by means of **HV Apparatus** name, nomenclature and numbering or position, as applicable) of each point of **Isolation**;

(b) whether **Isolation** has been achieved by an **Isolating Device** in the isolating position or by an adequate physical separation;

(c) where an **Isolating Device** has been used whether the isolating position is either :

(i) maintained by immobilising and **Locking** the **Isolating Device** in the isolating position and affixing a **Caution Notice** to it. Where the **Isolating Device** has been **Locked** with a **Safety Key** that the **Safety Key** has

been secured in a **Key Safe** and the **Key Safe Key** will be retained in safe custody; or

(ii) maintained and/or secured by such other method which must be in accordance with the **Local Safety Instructions** of **NGC** or that **User**, as the case may be; and

(d) where an adequate physical separation has been used that it will be in accordance with, and maintained by, the method set out in the **Local Safety Instructions** of ~~**NGC**~~ the **System Operator** or the **Relevant Transmission Licensee** or that **User**, as the case may be, and, if it is a part of that method, that a **Caution Notice** has been placed at the point of separation.

The confirmation of **Isolation** shall be recorded in the respective **Safety Logs**.

OC8.5.2.3 Following the confirmation of **Isolation** being established by the **Implementing Safety Co-ordinator** and the necessary establishment of relevant **Isolation** on the **Requesting Safety Co-ordinators System**, the **Requesting Safety Co-ordinator** may then request the implementation of **Earthing** by the **Implementing Safety Co-ordinator**, if agreed in section OC8.5.1.

OC8.5.3 Implementation of **Earthing**

OC8.5.3.1 The **Implementing Safety Co-ordinator** shall then establish the agreed **Earthing**.

OC8.5.3.2 The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Earthing** has been established, and identify the **Requesting Safety Co-ordinator's HV Apparatus** up to the **Connection Point**, for which the **Earthing** has been provided. The confirmation shall specify:

(a) for each **Location**, the identity (by means of **HV Apparatus** name, nomenclature and numbering or position, as is applicable) of each point of **Earthing**; and

(b) in respect of the **Earthing Device** used, whether it is:

(i) immobilised and **Locked** in the **Earthing** position. Where the **Earthing Device** has been **Locked** with a **Safety Key**, that the **Safety Key** has been secured in a **Key Safe** and the **Key Safe Key** will be retained in safe custody; or

(ii) maintained and/or secured in position by such other method which is in accordance with the **Local Safety Instructions** of ~~**NGC**~~ the **System Operator** or the **Relevant Transmission Licensee** or that **User**, as the case may be.

The confirmation of **Earthing** shall be recorded in the respective **Safety Logs**.

OC8.5.3.3. The **Implementing Safety Co-ordinator** shall ensure that the established **Safety Precautions** are maintained until requested to be removed by the relevant **Requesting Safety Co-ordinator**.

OC8.5.4 **RISSP** Issue Procedure

OC8.5.4.1 Where **Safety Precautions** on another **System(s)** are being provided to enable work on the **Requesting Safety Co-ordinator's System**, before any work commences they must be recorded by a **RISSP** being issued. The **RISSP** is applicable to **HV Apparatus** up to the **Connection Point** identified in section 1.1 of the RISSP-R and RISSP-I forms.

OC8.5.4.2 Where **Safety Precautions** are being provided to enable work to be carried out on both sides of the **Connection Point** a **RISSP** will need to be issued for each side of the **Connection Point** with ~~**NGC**~~ **Safety Co-ordinators** for the **Transmission System** and the respective **User's System** each enacting the role of **Requesting Safety Co-ordinator**. This will result in a RISSP-R and a RISSP-I form being completed by each of ~~**NGC**~~ the **Safety Co-ordinators** for the **Transmission System** and the **User's System**, with each **Safety Co-ordinator** issuing one **RISSP** number.

OC8.5.4.3 Once the **Safety Precautions** have been established (in accordance with OC8.5.2 and OC8.5.3), the **Implementing Safety Co-ordinator** shall complete parts 1.1 and 1.2 of a RISSP-I form recording the details specified in OC8.5.1.3, OC8.5.2.2 and OC8.5.3.2. Where **Earthing** has not been requested, Part 1.2(b) will be completed with the words "not applicable" or "N/A". He shall then contact the **Requesting Safety Co-ordinator** to pass on these details.

OC8.5.4.4 The **Requesting Safety Co-ordinator** shall complete Parts 1.1 and 1.2 of the RISSP-R, making a precise copy of the details received. On completion, the **Requesting Safety Co-ordinator** shall read the entries made back to the sender and check that an accurate copy has been made.

OC8.5.4.5 The **Requesting Safety Co-ordinator** shall then issue the number of the **RISSP**, taken from the RISSP-R, to the **Implementing Safety Co-ordinator** who will ensure that the number, including the prefix and suffix, is accurately recorded in the designated space on the RISSP-I form.

OC8.5.4.6 The **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** shall complete and sign Part 1.3 of the RISSP-R and RISSP-I respectively and then enter the time and date. When signed no alteration to the **RISSP** is permitted; the **RISSP** may only be cancelled.

OC8.5.4.7 The **Requesting Safety Co-ordinator** is then free to authorise work (including a test that does not affect the **Implementing Safety Co-ordinator's System**) in accordance with the requirements of the relevant internal safety procedures which apply to the **Requesting Safety Co-ordinator's System**. This is likely to involve the issue of safety documents or other relevant internal authorisations. Where testing is to be carried out which affects the **Implementing Safety Co-ordinator's System**, the procedure set out below in OC8.6 shall be implemented.

OC8.5.5 **RISSP** Cancellation Procedure

OC8.5.5.1 When the **Requesting Safety Co-ordinator** decides that **Safety Precautions** are no longer required, he will contact the relevant **Implementing Safety Co-ordinator** to effect cancellation of the associated **RISSP**.

OC8.5.5.2 The **Requesting Safety Co-ordinator** will inform the relevant **Implementing Safety Co-ordinator** of the **RISSP** identifying number (including the prefix and suffix), and agree it is the **RISSP** to be cancelled.

OC8.5.5.3 The **Requesting Safety Co-ordinator** and the relevant **Implementing Safety Co-ordinator** shall then respectively complete Part 2.1 of their respective RISSP-R and RISSP-I forms and shall then exchange details. The details being exchanged shall include their respective names and time and date. On completion of the exchange of details the respective **RISSP** is cancelled. The removal of **Safety Precautions** is as set out in OC8.5.5.4 and OC8.5.5.5.

OC8.5.5.4 Neither **Safety Co-ordinator** shall instruct the removal of any **Isolation** forming part of the **Safety Precautions** as part of the returning of the **HV Apparatus** to service until it is confirmed to each by each other that every earth on each side of the **Connection Point**, within the points of isolation identified on the **RISSP**, has been removed or disconnected by the provision of additional **Points of Isolation**.

OC8.5.5.5 Subject to the provisions in OC8.5.5.4, the **Implementing Safety Co-ordinator** is then free to arrange the removal of the **Safety Precautions**, the procedure to achieve that being entirely an internal matter for the party the **Implementing Safety Co-ordinator** is representing. The only situation in which any **Safety Precautions** may be removed without first cancelling the **RISSP** in accordance with OC8.5.5 or OC8.5.6 is when **Earthing** is removed in the situation envisaged in OC8.6.2(b).

OC8.5.6 **RISSP** Change Control

Nothing in this OC8 prevents ~~**NGC**~~ **Safety Coordinators** for the **Transmission System** ~~-~~and **User's System** agreeing to a simultaneous cancellation and issue of a new **RISSP**, if both agree. It should be noted, however, that the effect of that under the relevant **Safety Rules** is not a matter with which the **Grid Code** deals.

OC8.6 TESTING AFFECTING ANOTHER **SAFETY CO-ORDINATOR'S SYSTEM**

OC8.6.1 The carrying out of the test may affect **Safety Precautions** on **RISSPs** or work being carried out which does not require a **RISSP**. Testing can, for example, include the application of an independent test voltage. Accordingly, where the **Requesting Safety Co-ordinator** wishes to authorise the carrying out of such a test to which the procedures in OC8.6 apply he may not do so and the test will not take place unless and until the steps in (a)-(c) below have been followed and confirmation of completion has been recorded in the respective **Safety Logs**:

(a) confirmation must be obtained from the **Implementing Safety Co-ordinator** that:

(i) no person is working on, or testing, or has been authorised to work on, or test, any part of its **System** or another **System(s)** (other than the **System** of the **Requesting Safety Co-ordinator**) within the points of **Isolation** identified on the **RISSP** form relating to the test which is proposed to be undertaken, and

(ii) no person will be so authorised until the proposed test has been completed (or cancelled) and the **Requesting Safety Co-ordinator** has notified the **Implementing Safety Co-ordinator** of its completion (or cancellation);

(b) any other current **RISSPs** which relate to the parts of the **System** in which the testing is to take place must have been cancelled in accordance with procedures set out in OC8.5.5;

(c) the **Implementing Safety Co-ordinator** must agree with the **Requesting Safety Co-ordinator** to permit the testing on that part of the **System** between the points of **Isolation** identified in the **RISSP** associated with the test and the points of **Isolation** on the **Requesting Safety Co-ordinator's System**.

OC8.6.2 (a) The **Requesting Safety Co-ordinator** will inform the **Implementing Safety Co-ordinator** as soon as the test has been completed or cancelled and the confirmation shall be recorded in the respective **Safety Logs**.

(b) When the test gives rise to the removal of **Earthing** which it is not intended to re-apply, the relevant **RISSP** associated with the test shall be cancelled at the completion or cancellation of the test in accordance with the procedure set out in either OC8.5.5 or OC8.5.6. Where the **Earthing** is re-applied following the completion or cancellation of the test, there is no requirement to cancel the relevant **RISSP** associated with the test pursuant to this OC8.6.2.

OC8.7 EMERGENCY SITUATIONS

OC8.7.1 There may be circumstances where **Safety Precautions** need to be established in relation to an unintended electrical connection or situations where there is an unintended risk of electrical connection between the ~~**NGC**~~ **Transmission System** and a **User's System**, for example resulting from an incident where one line becomes attached or unacceptably close to another.

OC8.7.2 In those circumstances, if both ~~**NGC**~~ the **Safety Coordinator** for the **Transmission System** and the ~~respective~~**Safety Co-ordinator** for the **User's System** agree, the relevant provisions of OC8.5 will apply as if the electrical connections or potential connections were, solely for the purposes of this OC8, a **Connection Point**.

OC8.7.3 (a) The relevant **Safety Co-ordinator** shall be that for the electrically closest existing **Connection Point** to that **User's System** or such other local **Connection Point** as may be agreed between ~~**NGC**~~ **Safety Coordinators** for the **Transmission System** and the **User's System**, with discussions taking place between the relevant local **Safety Co-ordinators**. The **Connection Point** to be used shall be known in this OC8.7.3 as the "relevant **Connection Point**".

(b) The **Local Safety Instructions** shall be those which apply to the relevant **Connection Point**.

(c) The prefix for the **RISSP** will be that which applies for the relevant **Connection Point.**

OC8.8 SAFETY PRECAUTIONS RELATING TO WORKING ON EQUIPMENT NEAR TO THE HV SYSTEM

OC8.8 applies to the situation where work is to be carried out at a **User's Site** or a **Transmission**~~**NGC**~~ **Site** (as the case may be) on equipment of the **User** or ~~**NGC**~~the **System Operator** or a **Relevant Transmission Licensee** as the case may be, where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System**. It does not apply to other situations to which OC8 applies. In this part of OC8, a **Permit for Work for proximity work** is to be used, rather then the usual **RISSP** procedure, given the nature and effect of the work, all as further provided in the OC8.8.

OC8.8.1 Agreement of **Safety Precautions**

OC8.8.1.1 The **Requesting Safety Co-ordinator** who requires **Safety Precautions** on another **System(s)** when work is to be carried out at a **User's Site** or a ~~**NGC**~~**Transmission Site** (as the case may be) on equipment of the **User** or ~~**NGC**~~the **System Operator** or the **Relevant Transmission Licensee**, as the case may be, where the work or equipment is near to **HV Apparatus** on the **Implementing Safety Co-ordinator's System** will contact the relevant **Implementing Safety Co-ordinator(s)** to agree the Location of the **Safety Precautions** to be established, having as part of this process informed the **Implementing Safety Co-ordinator** of the equipment and the work to be undertaken. The respective **Safety Co-ordinators** will ensure that they discuss the request with their authorised site representative and that the respective authorised site representatives discuss the request at the **Connection Site**. This agreement will be recorded in the respective **Safety Logs**.

OC8.8.1.2 It is the responsibility of the **Implementing Safety Co-ordinator**, working with his authorised site representative as appropriate, to ensure that adequate **Safety Precautions** are established and maintained, on his and/or another **System** connected to his **System**, to enable **Safety From The System** to be achieved for work to be carried out at a **User's Site** or a ~~**NGC**~~**Transmission Site** (as the case may be) on equipment and in relation to work which is to be identified in the relevant part of the **Permit for Work for proximity work** where the work or equipment is near to **HV Apparatus** of the **Implementing Safety Co-ordinator's System** specified by the **Requesting Safety Co-ordinator**. Reference to another **System** in this OC.8.8.1.2 shall not include the **Requesting Safety Co-ordinator's System**.

OC8.8.1.3 In the event of disagreement

For safety co-ordination in England and Wales, ~~I~~in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, both shall be at the closest available points on the infeeds to the **HV Apparatus** near to which the work is to be carried out as indicated on the **Operation Diagram**.

For safety co-ordination in Scotland, in any case where the **Requesting Safety Co-ordinator** and the **Implementing Safety Co-ordinator** are unable to agree the **Location** of the **Isolation** and (if requested) **Earthing**, then the work shall not progress.

OC8.8.2 Implementation of **Isolation and Earthing**

OC8.8.2.1 Following the agreement of the **Safety Precautions** in accordance with OC8.8.1 the **Implementing Safety Co-ordinator** shall then establish the agreed **Isolation** and (if required) **Earthing**.

OC8.8.2.2 The **Implementing Safety Co-ordinator** shall confirm to the **Requesting Safety Co-ordinator** that the agreed **Isolation** and (if required) **Earthing** has been established.

OC8.8.2.3 The **Implementing Safety Co-ordinator** shall ensure that the established **Safety Precautions** are maintained until requested to be removed by the relevant **Requesting Safety Co-ordinator**.

OC8.8.3 **Permit for Work for proximity work** Issue Procedure

OC8.8.3.1 Where **Safety Precautions** on another **System(s)** are being provided to enable work to be carried out at a **User's Site** or **Transmission**~~**NGC**~~ **Site** (as the case may be)

on equipment where the work or equipment is in proximity to **HV Apparatus** of the **Implementing Safety Co-ordinator**, before any work commences they must be recorded by a **Permit for Work for proximity work** being issued. The **Permit for Work for proximity work** shall identify the **Implementing Safety Co-ordinator's HV Apparatus** in proximity to the required work

OC8.8.3.2 Once the **Safety Precautions** have been established (in accordance with OC8.8.2), the **Implementing Safety Co-ordinator** shall agree to the issue of the **Permit for Work for proximity work** with the appropriately authorised site representative of the **Requesting Safety Co-ordinator's Site**. The **Implementing Safety Co-ordinator** will inform the **Requesting Safety Co-ordinator** of the **Permit for Work for proximity work** identifying number.

OC8.8.3.3 The appropriately authorised site representative of the **Implementing Safety Co-ordinator** shall then issue the **Permit for Work for proximity work** to the appropriately authorised site representative of the **Requesting Safety Co-ordinator**. The **Permit for Work for proximity work** will in the section dealing with the work to be carried out, be completed to identify that the work is near the **Implementing Safety Co-ordinator's HV Apparatus.** No further details of the **Requesting Safety Co-ordinator's** work will be recorded, as that is a matter for the **Requesting Safety Co-ordinator** in relation to his work.

OC8.8.3.4 The **Requesting Safety Co-ordinator** is then free to authorise work in accordance with the requirements of the relevant internal safety procedures which apply to the **Requesting Safety Co-ordinator's Site**. This is likely to involve the issue of safety documents or other relevant internal authorisations.

OC8.8.4 **Permit for Work for proximity work** Cancellation Procedure

OC8.8.4.1 When the **Requesting Safety Co-ordinator** decides that **Safety Precautions** are no longer required, he will contact the relevant **Implementing Safety Co-ordinator** to effect cancellation of the associated **Permit for Work for proximity work**.

OC8.8.4.2 The **Requesting Safety Co-ordinator** will inform the relevant **Implementing Safety Co-ordinator** of the **Permit for Work for proximity work** identifying number, and agree that the **Permit for Work for proximity work** can be cancelled. The cancellation is then effected by the appropriately authorised site representative of the **Requesting Safety Co-ordinator** returning the **Permit for Work for proximity work** to the appropriately authorised site representative of the **Implementing Safety Co-ordinator**.

OC8.8.4.3 The **Implementing Safety Co-ordinator** is then free to arrange the removal of the **Safety Precautions**, the procedure to achieve that being entirely an internal matter for the party the **Implementing Safety Co-ordinator** is representing.

OC8.9 LOSS OF INTEGRITY OF **SAFETY PRECAUTIONS**

OC8.9.1 In any instance when any **Safety Precautions** may be ineffective for any reason the relevant **Safety Co-ordinator** shall inform the other **Safety Co-ordinator(s)** without delay of that being the case and, if requested, of the reasons why.

OC8.10 SAFETY LOG

OC8.10.1 **Safety Coordinators** for the **Transmission System** ~~**NGC**~~ and **User's System** shall maintain **Safety Logs** which shall be a chronological record of all messages relating

to safety co-ordination under **OC8** sent and received by the **Safety Co-ordinator(s)**. For safety co-ordination in England and Wales, ~~T~~the **Safety Logs** must be retained for a period of not less than one year. For safety co-ordination in Scotland, the **Safety Logs** must be retained for a period of not less than six years.

OC8 - APPENDIX A

[~~**NATIONAL GRID COMPANY**~~**Transmission System**] [_____ **CONTROL CENTRE/SITE**]

RECORD OF INTER-SYSTEM **SAFETY PRECAUTIONS** (RISSP-R)
(**Requesting Safety Co-ordinator's** Record)

RISSP NUMBER

PART 1

1.1 **HV APPARATUS** IDENTIFICATION

Safety Precautions have been established by the **Implementing Safety Co-ordinator** (or by another **User** on that **User's System** connected to the **Implementing Safety Co-ordinator's System**) to achieve (in so far as it is possible from that side of the **Connection Point**) **Safety From The System** on the following **HV Apparatus** on the **Requesting Safety Co-ordinator's System**: [State identity - name(s) and, where applicable, identification of the **HV** circuit(s) up to the **Connection Point**]:

_____

_____

Further **Safety precautions** required on the **Requesting Safety Co-ordinator's System** as notified by the **Implementing Safety Co-ordinator**.

_____

1.2 **SAFETY PRECAUTIONS** ESTABLISHED

(a) **ISOLATION**

[State the **Location(s)** at which **Isolation** has been established (whether on the **Implementing Safety Co-ordinator's System** or on the **System** of another **User** connected to the **Implementing Safety Co-ordinator's System**). For each **Location,** identify each point of **Isolation**. For each point of **Isolation**, state the means by which the **Isolation** has been achieved, and whether, immobilised and **Locked**, **Caution Notice** affixed, other safety procedures applied, as appropriate.]

_____

_____

_____

(b) **EARTHING**

[State the **Location(s)** at which **Earthing** has been established (whether on the **Implementing Safety Co-ordinator's System** or on the **System** of another **User** connected to the **Implementing Safety Co-ordinator's System**). For each **Location**, identify each point of **Earthing**. For each point of **Earthing**, state the means by which **Earthing** has been achieved, and whether, immobilised and **Locked**, other safety procedures applied, as appropriate].

_____

_____

_____

1.3 ISSUE

I have received confirmation from _____ (name of **Implementing Safety Co-ordinator**) at _____ (location) that the **Safety Precautions** identified in paragraph 1.2 have been established and that instructions will not be issued at his location for their removal until this **RISSP** is cancelled.

Signed .....(**Requesting Safety Co-ordinator**)

at .....(time) on ..... (Date)

PART 2

2.1 CANCELLATION

I have confirmed to _____ (name of the **Implementing Safety Co-ordinator**) at _____ (location) that the **Safety Precautions** set out in paragraph 1.2 are no longer required and accordingly the **RISSP** is cancelled.

Signed .....(**Requesting Safety Co-ordinator**)

at .....(time) on ..... (Date)

OC8 - APPENDIX B

[~~**NATIONAL GRID COMPANY**~~**Transmission System**] [_____ **CONTROL CENTRE/SITE**]

RECORD OF INTER-SYSTEM **SAFETY PRECAUTIONS** (RISSP-I)
(**Implementing Safety Co-ordinator**'s Record)

PART 1 **RISSP** NUMBER

1.1 **HV APPARATUS** IDENTIFICATION

Safety Precautions have been established by the **Implementing Safety Co-ordinator** (or by another **User** on that **User's System** connected to the **Implementing Safety Co-ordinator's System**) to achieve (in so far as it is possible from that side of the **Connection Point**) **Safety From The System** on the following **HV Apparatus** on the **Requesting Safety Co-ordinator's System**: [State identity - name(s) and, where applicable, identification of the **HV** circuit(s) up to the **Connection Point**]:

_____

_____

Recording of notification given to the **Requesting Safety Co-ordinator** concerning further **Safety Precautions** required on the **Requesting Safety Co-ordinator's System**.

1.2 **SAFETY PRECAUTIONS** ESTABLISHED

(a) **ISOLATION**

[State the **Location(s)** at which **Isolation** has been established (whether on the **Implementing Safety Co-ordinator's System** or on the **System** of another **User** connected to the **Implementing Safety Co-ordinator's System**). For each **Location,** identify each point of **Isolation**. For each point of **Isolation**, state the means by which the **Isolation** has been achieved, and whether, immobilised and **Locked**, **Caution Notice** affixed, other safety procedures applied, as appropriate.]

_____

_____

_____

(b) **EARTHING**

[State the **Location(s)** at which **Earthing** has been established (whether on the **Implementing Safety Co-ordinator's System** or on the **System** of another **User** connected to the **Implementing Safety Co-ordinator's System**). For each **Location**, identify each point of **Earthing**. For each point of **Earthing**, state the means by which **Earthing** has been achieved, and whether, immobilised and **Locked**, other safety procedures applied, as appropriate].

_____

_____

_____

1.3 ISSUE

I have confirmed to _____ (name of **Requesting Safety Co-ordinator**) at _____ (location) that the **Safety Precautions** identified in paragraph 1.2 have been established and that instructions will not be issued at my location for their removal until this **RISSP** is cancelled.

Signed .....(**Implementing Safety Co-ordinator**)

at .....(time) on ..... (Date)

PART 2

2.1 CANCELLATION

I have received confirmation from _____ (name of the **Requesting Safety Co-ordinator**) at _____ (location) that the **Safety Precautions** set out in paragraph 1.2 are no longer required and accordingly the **RISSP** is cancelled.

Signed .....(**Implementing Safety Co-ordinator**)

at .....(time) on ..... (Date)

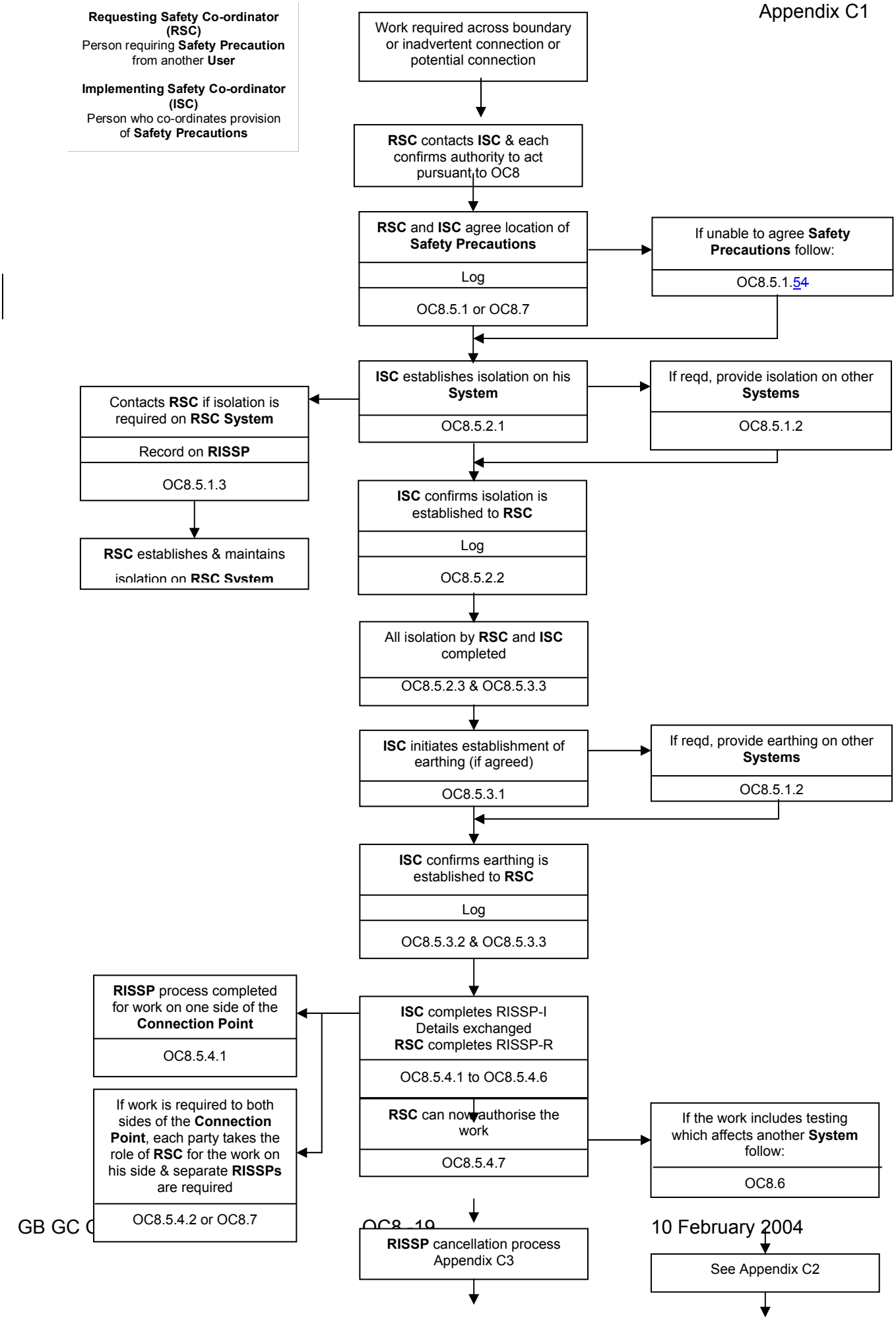
(Note: This form to be of a different colour from RISSP-R)

Appendix C1

RISSP ISSUE PROCESS

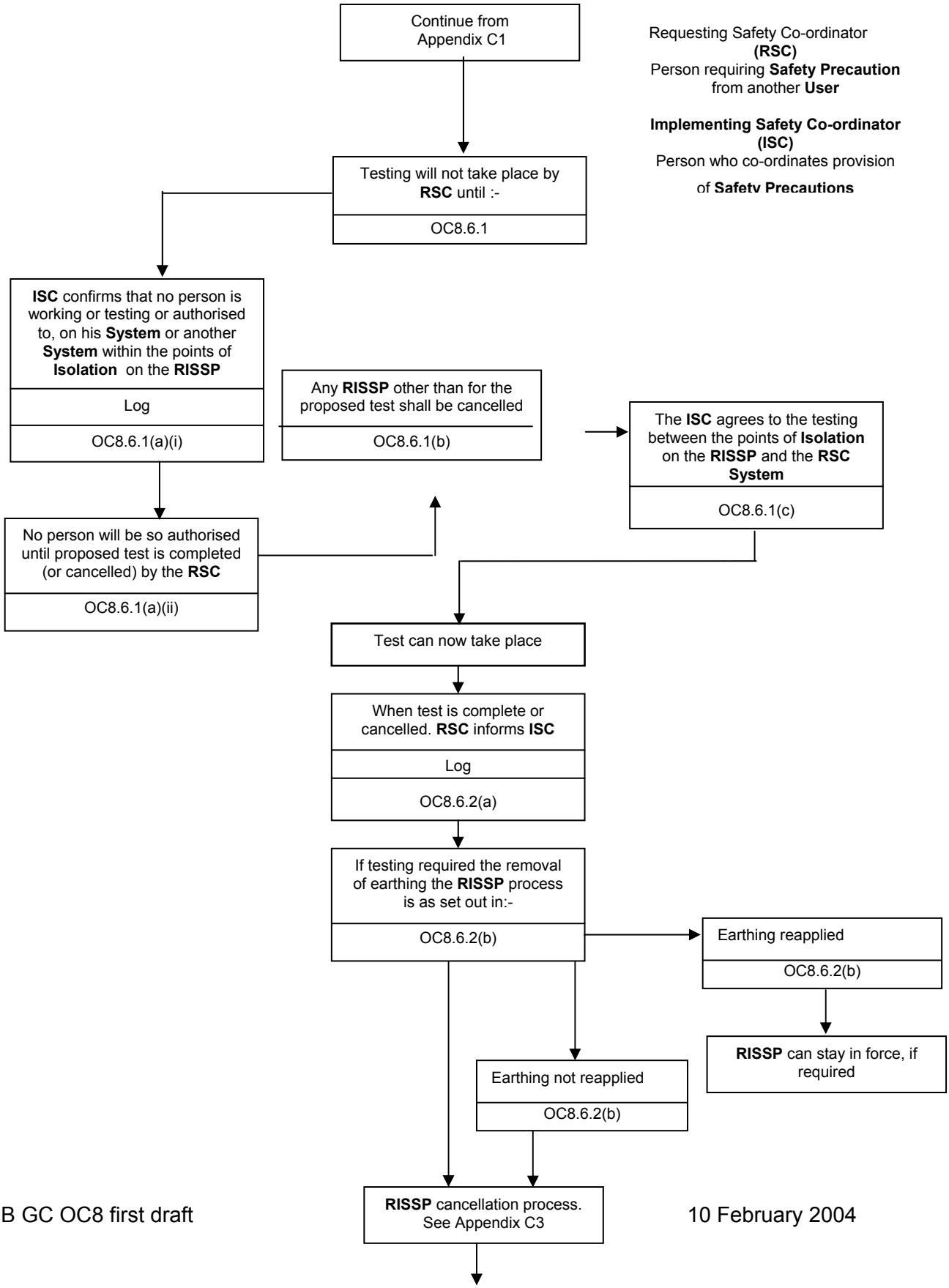
Requesting Safety Co-ordinator (RSC)
Person requiring **Safety Precaution** from another **User**

Implementing Safety Co-ordinator (ISC)
Person who co-ordinates provision of **Safety Precautions**



Appendix C2

TESTING PROCESS
Where testing affects another Safety Co-ordinator's System



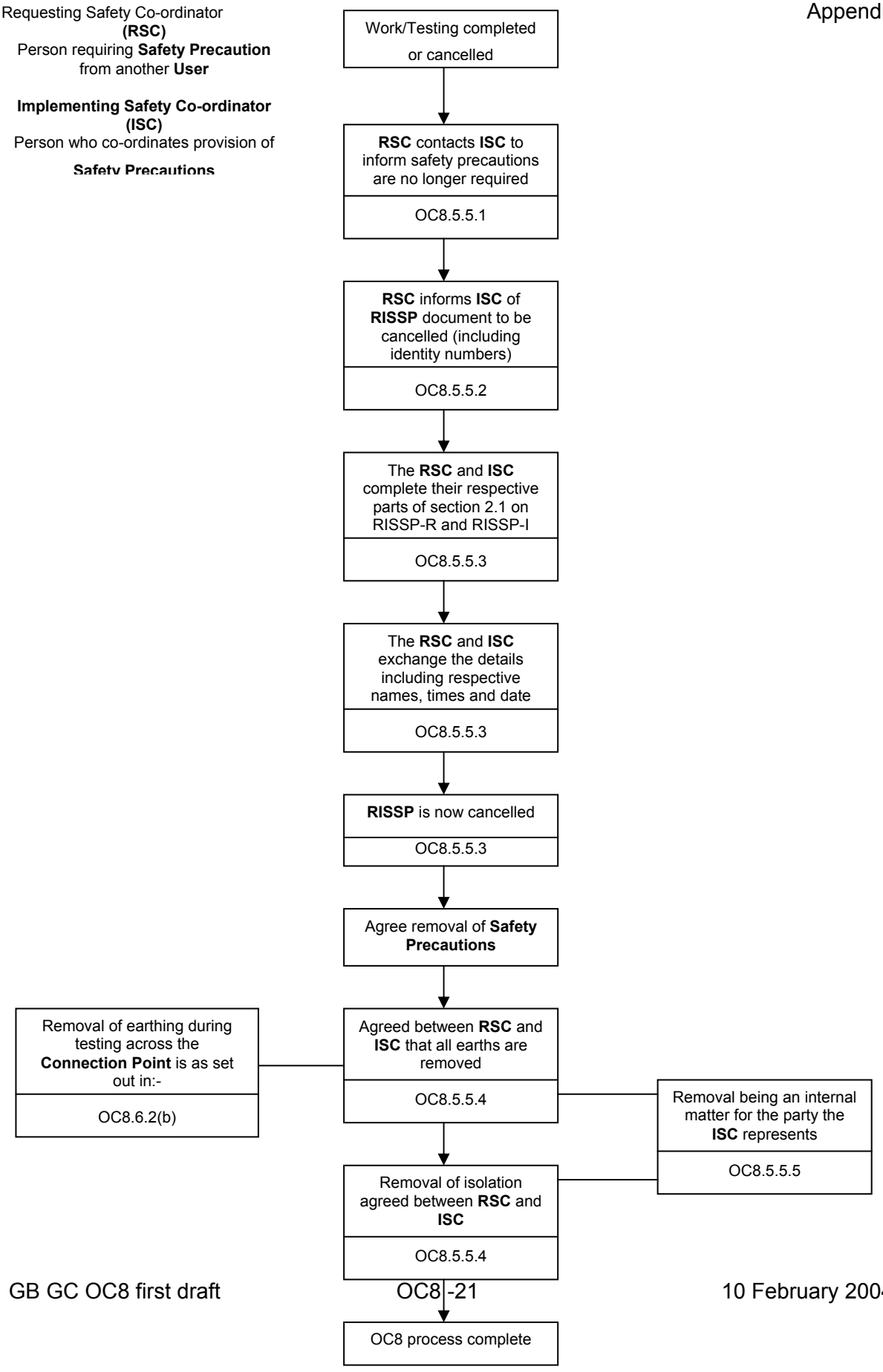
Appendix C3

RISSP CANCELLATION PROCESS

Requesting Safety Co-ordinator **(RSC)**
Person requiring **Safety Precaution** from another **User**

Implementing Safety Co-ordinator (ISC)
Person who co-ordinates provision of

Safety Precautions

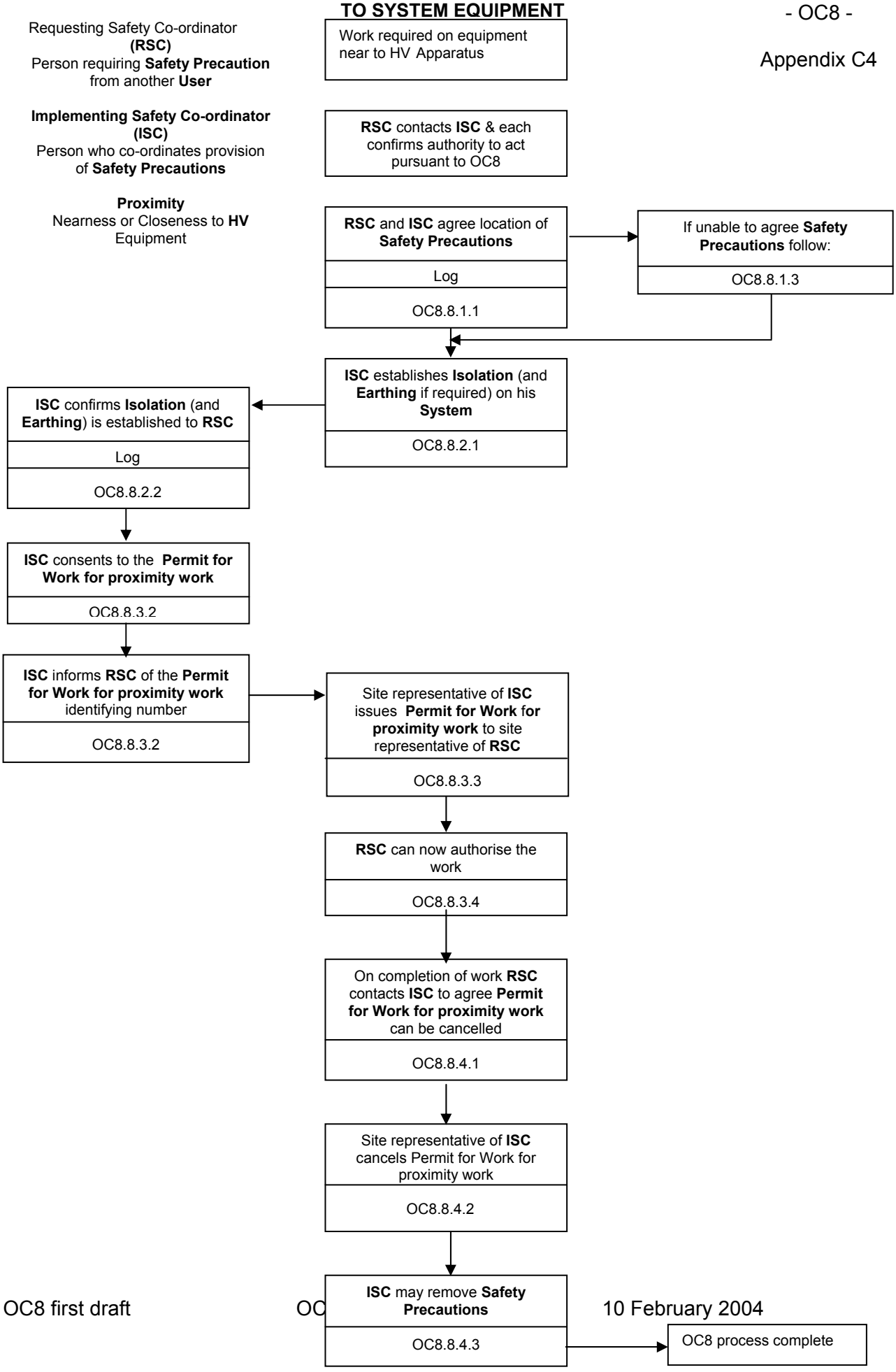


PROCESS FOR WORKING NEAR TO SYSTEM EQUIPMENT

Requesting Safety Co-ordinator **(RSC)**
Person requiring **Safety Precaution** from another **User**

Implementing Safety Co-ordinator (ISC)
Person who co-ordinates provision of **Safety Precautions**

Proximity
Nearness or Closeness to **HV** Equipment



National Grid Safety Circular (NGSC)	**NGSC Number:** **.....**
RISSP prefixes - Issue x	**Date:** **Issued By:**
Example	

Pursuant to the objectives of The Grid Code, Operating Code 8 - Safety Co-ordination, this circular will be used in relation to all cross boundary safety management issues with the National Grid Company customers. Of particular note will be the agreed prefixes for the Record of Inter System Safety Precautions (RISSP) documents.

OC8 APPENDIX E
[Form of NGC Permit for Work]

No.

PERMIT FOR WORK

1.
Location……..
Equipment
Identification……..
……..……..
……

Work to be done
……
……
……..…

2. Precautions taken to achieve Safety from the System
Points of Isolation
……..
……
……..
……
……..
Primary Earths…….
……
……..…
……
……
……..…
Actions taken to avoid **Danger** by draining, venting, purging and containment or dissipation of stored energy*
……
……..
……
……..…
Further precautions to be taken during the course of the work to avoid **System** derived hazards*
……....
……
……..…
……
……

3. Precautions that may be varied*……..
……
……
……..…
……
……
……..…
……
……
……..…

4. Preparation
Control Person(s) (Safety) giving Consent

Key Safe number*

State whether this **Permit for Work** must be personally retained yes no

Signed | Time | Date

Senior Authorised Person

5. Issue & Receipt

Key Safe Number* | **Safety Keys** (No. off)*

Earthing Schedule Number* | Portable **Drain earths** (No. off)*

Recommendations for **General Safety** Report Number* | **Approved** (ROMP)#/**Card Safe**#/ Procedure Number*

Circuit Identification – Colours/ Wristlets (No. off)* Symbols* | Flags (No. off)*

Issued (Signed)

Senior Authorised Person

Received (Signed) Date | Time

Competent Person

Name (Block letters) | Company

delete as appropriate *write N/A if not applicable
February 1995

< End of OC8 >

Appendix 3 – EWGC OC11/SGC OC9 Comparison Table

SGC ref	EWGC/GBGC equiv	Provisions	Comment	GBGC change required?
1.	**OC11.1**	**Introduction**		
1.1	OC11.1.1	In both codes, sets out the numbering and nomenclature (N&N) which applies to Company/NGC Plant & Apparatus (P&A) on User's Sites and User's P&A on Company/NGC Sites. In the SGC, sets out the responsibilities and procedures at ownership boundaries for notifying the N&N of new P&A and changing existing N&N.	Equivalent.	Changed to GB-ise.
n/a	OC11.1.2	In the EWGC, the N&N of each item of HV Apparatus shall be included in the Operation Diagram prepared for each NGC Site or User Site. Further provisions on Operation Diagrams are in the Connection Conditions and each Bilateral.	Propose for GBGC.	Changed to GB-ise.
n/a	OC11.1.3	In the EWGC, in OC11 the term "HV Apparatus" includes any SF_6 Gas Zones associated with any HV Apparatus.	Propose for GBGC.	None.
2.	**OC11.2**	**Objective**		
2.1	OC11.2.1	In both codes, to ensure safe and effective operation and require N&N as used by the Company/NGC.	Equivalent.	Changed to GB-ise

SGC ref	EWGC/GBGC equiv	Provisions	Comment	GBGC change required?
		In the EWGC, 'The overall objective of **OC11** is to ensure, so far as possible, the safe and effective operation of the **Total System** and to reduce the risk of human error faults by requiring, in certain circumstances, that the numbering and nomenclature of **User's HV Apparatus** shall be in accordance with the system used from time to time by **NGC.'**		
3.	**OC11.3**	**Scope**		
3.1	OC11.3.1	In both codes, applies to the Company/NGC and all Users.	Equivalent.	Changed to GB-ise.
4.	**OC11.4**	**Procedure**		
n/a	OC11.4.1.1	In the EWGC, 'The term "User Site" means a site owned (or occupied pursuant to a lease, licence or other agreement) by a User in which there is a Connection Point. For the avoidance of doubt, where a site is owned by NGC but occupied by a User (as aforesaid), the site is a User Site.'	Propose for GBGC.	Changed to GB-ise.
n/A	OC11.4.1.2	In the EWGC, 'The term "**NGC Site**" means a site owned (or occupied pursuant to a lease, licence or other agreement) by **NGC** in which there is a **Connection Point**. For the avoidance of doubt, where a site is owned by a **User** but occupied by **NGC** (as aforesaid), the site is an **NGC Site**. '	Propose for GBGC.	Changed to GB-ise.

SGC ref	EWGC/GBGC equiv	Provisions		Comment	GBGC change required?
4.1	**OC11.4.2**	**New Company Plant and /or Apparatus on Users' Sites**	**NGC HV Apparatus on Users' Sites**		
(i)	(a)	The Company/NGC P&A on User's sites will use the Company/NGC's N&N		Equivalent.	Changed to GB-ise.
(ii)	(b)	At least 8 months prior to installation of new P&A the Company/NGC will notify the User of the N&N for that P&A		Equivalent.	Changed to GB-ise.
(iii)	(c)	The notification will be in writing. It will comprise an Operation Diagram showing the P&A		Equivalent.	Changed to GB-ise.
(iv)	GC	Notifications will be sent in accordance with the General Conditions.		Covered in the EWGC GC in GC.6.1.	
(v)	(d)	The User will respond within two (SGC)/one (EWGC) months. Confirming that the proposed N&N is not similar to other P&A. If it is similar, the User must change the other P&A before the installation of the P&A		Timing difference between the codes. No strong reason for a difference, propose conform to EWGC.	Changed to GB-ise.
(vi)	(e)	The User will not permit installation of other P&A with similar nomenclature to that already installed or notified by the Company/NGC.		Equivalent.	Changed to GB-ise.
4.2	**OC11.4.3**	**Users' New Plant and/or Apparatus on Sites**	**User HV Apparatus on NGC Sites**		
(i)	(a)	User's P&A on Company/NGC Sites will use Company/NGC's N&N		Equivalent.	Changed to GB-ise.
(ii)	(b)	At least 8 months prior to installation of new N&N the User will notify		Equivalent.	Changed to

SGC ref	EWGC/GBGC equiv	Provisions	Comment	GBGC change required?
		the Company/NGC of the N&N		GB-ise.
(iii)	(c)	The notification will be in writing. It will comprise an Operation Diagram showing the P&A	Equivalent.	Changed to GB-ise.
(iv)	(d)	The Company/NGC will respond within two/one months. Confirming that the proposed N&N is acceptable or alternative N&N to be used by the User	Timing difference between the codes; no strong reason for a difference, propose conform to EWGC.	Changed to GB-ise.
4.3	OC11.4.4	**Changes**		
4.3	(a) & (b)	Where the Company/NGC decides to change N&N of existing Company/NGC P&A at a User Site or User P&A at a Company/NGC Site, the provisions of paragraph 4.1/OC11.4.2 shall apply.	Equivalent. Would expect the SGC to refer also to 4.2.	Changed to GB-ise.
4.4	n/a	**New Company P and/or A and new N and/or N of Company P&A at Company Sites with an Ownership Boundary**		
4.4	n/a	When the Company wants to install new P&A or change the N&N of its existing P&A at a Company Site with an Ownership Boundary with a User, the Company will send to each User a revised Operation Diagram of the Company Site at the Ownership Boundary incorporating the new P&A or N&N.	In the SGC, sites with an 'ownership boundary' are addressed here. In EWGC, covered by general requirements.	n/a
4.5	n/a	**Users' New P and/or A and new N and/or N of User's P and/or A at Users' Sites with an Ownership Boundary**		
4.5	n/a	When the User wants to install new P&A or change the N&N of existing its P&A at a User Site with an Ownership Boundary with the Company, the User will send to the Company a revised Operation	In the SGC sites with an 'ownership boundary' are addressed here. In EWGC,	n/a

SGC ref	EWGC/GBGC equiv	Provisions		Comment	GBGC change required?
		Diagram of the User's Site at the Ownership Boundary incorporating the new P&A or N&N.		covered by general requirements.	
4.6	OC11.4.5	**Provision of current N&N system**	**no title**		
4.6	OC11.4.5	The Company/NGC shall provide Users on request with their N&N system.		Equivalent	Changed to GB-ise.
4.7	OC11.4.6	**Provision of labelling**	no title		
		The party installing P&A which is the subject of OC9/OC11 shall be responsible for the provision and erection of clear and unambiguous labelling.		Equivalent. Note that the GBGC obligation will be placed on the system operator.	Changed to GB-ise.
n/a	OC11.4.7	In the EWGC, NGC will not change its N&N system other than to reflect new technology etc.		No equivalent in the SGC. Scottish companies have different standards, not appropriate to conform for BETTA implementation.	Propose a regional difference.

Appendix 4 - Proposed GBGC OC11 drafting

OPERATING CODE NO.11

NUMBERING AND NOMENCLATURE OF

HIGH VOLTAGE APPARATUS AT CERTAIN SITES

CONTENTS

(This contents page does not form part of the Grid Code)

Paragraph No/Title Page Number

OPERATING CODE NO.11
NUMBERING AND NOMENCLATURE OF
HIGH VOLTAGE APPARATUS AT CERTAIN **SITES**

OC11.1 INTRODUCTION

OC11.1.1 **Operating Code No.11** ("**OC11**") sets out the requirement that:

(a) ~~**NGC**~~ **Transmission HV Apparatus** on **Users' Sites**; and

(b) **User HV Apparatus** on ~~**NGC**~~ **Transmission Sites**;

shall have numbering and nomenclature in accordance with the system used from time to time by the **System Operator**~~**NGC**~~.

OC11.1.2 The numbering and nomenclature (if required under the system of numbering and nomenclature used from time to time by ~~**NGC**~~the **System Operator**) of each item of **HV Apparatus** shall be included in the **Operation Diagram** prepared for each ~~**NGC**~~ **Transmission Site** or **User Site,** as the case may be. Further provisions on **Operation Diagrams** are contained in the **Connection Conditions** and in each **Bilateral Agreement**.

OC11.1.3 In **OC11** the term "**HV Apparatus**" includes any **SF_6 Gas Zones** associated with any **HV Apparatus**.

OC11.2 OBJECTIVE

OC11.2.1 The overall objective of **OC11** is to ensure, so far as possible, the safe and effective operation of the **Total System** and to reduce the risk of human error faults by requiring, in certain circumstances, that the numbering and nomenclature of **User's HV Apparatus** shall be in accordance with the system used from time to time by ~~**NGC**~~the **System Operator**.

OC11.3 SCOPE

OC11.3.1 **OC11** applies to the **System Operator**~~**NGC**~~ and to **Users**, which in **OC11** means:-

(a) **Generators;**

(b) **Network Operators**; and

(c) **Non-Embedded Customers**.

OC11.4 PROCEDURE

OC11.4.1.1 The term "**User Site**" means a site owned (or occupied pursuant to a lease, licence or other agreement) by a **User** in which there is a **Connection Point**. For the avoidance of doubt, where a site is owned by ~~NGC~~ the **System Operator** (in England and Wales) or a **Relevant Transmission Licensee** (in Scotland) but occupied by a **User** (as aforesaid), the site is a **User Site**.

OC11.4.1.2 The term "**Transmission~~NGC~~ Site**" means a site owned (or occupied pursuant to a lease, licence or other agreement) by ~~NGC~~ the **System Operator** (in England and Wales) or by a **Relevant Transmission Licensee** (in Scotland) in which there is a **Connection Point**. For the avoidance of doubt, where a site is owned by a **User** but occupied by ~~NGC~~ the **System Operator** (in England and Wales) or **a Relevant Transmission Licensee** (in Scotland)(as aforesaid), the site is a~~n NGC~~ **Transmission Site**.

OC11.4.2 **Transmission~~NGC~~ HV Apparatus** on **Users' Sites**

(a) **Transmission~~NGC~~ HV Apparatus** on **Users' Sites** shall have numbering and nomenclature in accordance with the system used from time to time by the **System Operator~~NGC~~**;

(b) when the **System Operator** (for sites in England and Wales) or the **Relevant Transmission Licensee** (for sites in Scotland)~~NGC~~ is to install its **HV Apparatus** on a **User's Site**, the **System Operator ~~NGC~~** shall (unless it gives rise to a **Modification** under the **CUSC**, in which case the provisions of the **CUSC** as to the timing apply) notify the relevant **User** of the numbering and nomenclature to be adopted for that **HV Apparatus** at least eight months prior to proposed installation;

(c) the notification will be made in writing to the relevant **User** and will consist of both a proposed **Operation Diagram** incorporating the proposed new **Transmission~~NGC~~ HV Apparatus** to be installed, its proposed numbering and nomenclature, and the date of its proposed installation;

(d) the relevant **User** will respond in writing to ~~NGC~~ the **System Operator** within one month of the receipt of the notification, confirming receipt and confirming either that any other **HV Apparatus** of the relevant **User** on such **User Site** does not have numbering and/or nomenclature which could be confused with that proposed by the **System Operator~~NGC~~**, or, to the extent that it does, that the relevant other numbering and/or nomenclature will be changed before installation of the ~~NGC~~ **Transmission HV Apparatus**;

(e) the relevant **User** will not install, or permit the installation of, any **HV Apparatus** on such **User Site** which has

numbering and/or nomenclature which could be confused with ~~NGC~~ **Transmission HV Apparatus** which is either already on that **User Site** or which ~~NGC~~ the **System Operator** has notified that **User** will be installed on that **User Site**.

OC11.4.3 **User HV Apparatus** on ~~NGC~~ **Transmission Sites**

(a) **User HV Apparatus** on ~~NGC~~ **Transmission Sites** shall have numbering and nomenclature in accordance with the system used from time to time by ~~NGC~~the **System Operator**;

(b) when a **User** is to install its **HV Apparatus** on a~~n~~ ~~NGC~~ **Transmission Site,** or it wishes to replace existing **HV Apparatus** on a~~n~~ ~~NGC~~ **Transmission Site** and it wishes to adopt new numbering and nomenclature for such **HV Apparatus**, the **User** shall (unless it gives rise to a **Modification** under the **CUSC** in which case the provisions of the **CUSC** as to the timing apply) notify ~~NGC~~ the **System Operator** of the details of the **HV Apparatus** and the proposed numbering and nomenclature to be adopted for that **HV Apparatus**, at least eight months prior to proposed installation;

(c) the notification will be made in writing to ~~NGC~~ the **System Operator** and shall consist of both a proposed **Operation Diagram** incorporating the proposed new **HV Apparatus** of the **User** to be installed, its proposed numbering and nomenclature, and the date of its proposed installation;

(d) ~~NGC~~ the **System Operator** will respond in writing to the **User** within one month of the receipt of the notification stating whether or not ~~NGC~~ the **System Operator** accepts the **User's** proposed numbering and nomenclature and, if they are not acceptable, it shall give details of the numbering and nomenclature which the **User** shall adopt for that **HV Apparatus**.

OC11.4.4 Changes

Where ~~NGC~~ the **System Operator** in its reasonable opinion has decided that it needs to change the existing numbering or nomenclature of ~~NGC~~ **Transmission HV Apparatus** on a **User's Site** or of **User's HV Apparatus** on a~~n~~ ~~NGC~~ **Transmission Site**:

(a) the provisions of paragraph OC11.4.2 shall apply to such change of numbering or nomenclature of ~~NGC~~ **Transmission HV Apparatus** with any necessary amendments to those provisions to reflect that only a change is being made; and

(b) in the case of a change in the numbering or nomenclature of **User's HV Apparatus** on a~~n **NGC**~~ **Transmission Site**, ~~**NGC**~~ the **System Operator** will (unless it gives rise to a **Modification** under the **CUSC**, in which case the provisions of the **CUSC** as to the timing apply) notify the **User** of the numbering and/or nomenclature the **User** shall adopt for that **HV Apparatus** (the notification to be in a form similar to that envisaged under OC11.4.2) at least eight months prior to the change being needed and the **User** will respond in writing to ~~**NGC**~~ the **System Operator,** within one month of the receipt of the notification, confirming receipt.

In either case the notification shall indicate the reason for the proposed change.

OC11.4.5 **Users** will be provided upon request with details of ~~**NGC's**~~ the **System Operator's** then current numbering and nomenclature system in order to assist them in planning the numbering and nomenclature for their **HV Apparatus** on ~~**NGC**~~ **Transmission Sites**.

OC11.4.6 When ~~either **NGC** or~~ a **User** installs **HV Apparatus** which is the subject of **OC11**, ~~**NGC** or~~ the **User**~~, as the case may be, installing such **HV Apparatus**~~ shall be responsible for the provision and erection of clear and unambiguous labelling showing the numbering and nomenclature. Where a **User** is required by **OC11** to change the numbering and/or nomenclature of **HV Apparatus** which is the subject of **OC11**, the **User** will be responsible for the provision and erection of clear and unambiguous labelling by the required date. ~~Where **NGC** changes the numbering and/or nomenclature of its **HV Apparatus** which is the subject of **OC11**, **NGC** will be responsible for the provision and erection of clear and unambiguous labelling showing the numbering and nomenclature by the required date.~~

When either the **System Operator** (for sites in England and Wales), or a **Relevant Transmission Licensee** (for sites in Scotland) installs **HV Apparatus** which is the subject of **OC11**, the **System Operator** shall be responsible for the provision and erection of clear and unambiguous labelling showing the numbering and nomenclature. Where the **System Operator** changes the numbering and/or nomenclature of **HV Apparatus** which is the subject of **OC11**, the **System Operator** will be responsible for the provision and erection of clear and unambiguous labelling showing the numbering and nomenclature by the required date.

OC11.4.7 For sites in England and Wales, the ~~**NGC**~~ **System Operator** will not change its system of numbering and nomenclature in use immediately prior to the **Transfer Date** (which is embodied in OM5 (Operation Memorandum No.5 - Numbering and Nomenclature of HV Apparatus on the CEGB Grid System Issue 3 June 1987)), other than to reflect new or newly adopted technology or **HV Apparatus**. For the

avoidance of doubt, this OC11.4.7 refers to the system of numbering and nomenclature, and does not preclude changes to the numbering and/or nomenclature of **HV Apparatus** which are necessary to reflect newly installed **HV Apparatus**, or re-configuration of **HV Apparatus** installed, and similar changes being made in accordance with that system of numbering and nomenclature.

< End of OC11 >