

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

9 March 2004

0141 568 4469

Dear Bridget,

**GB Grid Code  
Operating Code 8 (SGC OC6), Operating Code 11 (SGC OC9) and Balancing Codes  
February 2004**

Thank you for the opportunity to respond to this consultation. This response is submitted on behalf of ScottishPower UK Division, which includes the UK energy businesses of ScottishPower, namely ScottishPower Energy Management Ltd, ScottishPower Generation Ltd and ScottishPower Energy Retail Ltd.

ScottishPower UK Division is very concerned that the contractual complexities which follow from Ofgem/DTI's insistence that there is no direct contractual link between the user and the Transmission Owner to whose network the User's apparatus is connected will jeopardise safety. A fundamental component of a safe system of work is the clear definition of roles and responsibilities, and nowhere is this more important than when working at the interface between two systems under separate control. In our view, the new introductory paragraph of OC8 is an unacceptable confusion of the operational environment by contractual issues. Operational staff preparing internal safety procedures should not have to deal with paragraphs like that, nor should they need to deal with generalised multi-area text. **As a minimum, OC8 should be written as separate codes for Scotland and England & Wales.**

However, our concerns go further than merely the detail of OC8. The split-transmission model adopted for BETTA by Ofgem/DTI has the potential to create a confusing operational environment for users' staff faced with two control authorities, the GBSO and the local TO. **Our preference would be for operational and safety issues to be dealt with in licensee-specific tri-partite agreements.** We have previously argued<sup>1</sup> for a direct contractual relationship between the user and the TO. In the absence of such a relationship, and recognising that the contractual issues of rights, obligations, liabilities, etc. will need to be detailed in the CUSC and STC, these tri-partite agreements would take the form of operation and safety codes and would include all matters pertaining to the operation of interfaces with that licensee's network. **Such an agreement would be our preferred means of maintaining the existing high level of safety at operational interfaces and ensuring clarity and certainty in an area where these are imperative.**

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<sup>1</sup> Please see ScottishPower responses to the consultations of December 2002 and June 2003 on the GB CUSC.

Our comments on the detail of the proposals contained in the consultation paper are set out below, referenced to the paragraph numbers of the consultation paper. However, in making these comments we are conscious both of the principle adopted by Ofgem/DTI that only changes necessary for the implementation of BETTA should be made, and of the fact that there is an enormous amount of other work being carried out in preparation for BETTA. We are not convinced that the changes to the Scottish arrangements which would follow from the implementation of the proposed GB OC8 are necessary for BETTA, or that the current environment is conducive to careful scrutiny of the changes and their possible consequences, or that the organisations concerned possess sufficient capacity for change to be able to implement changes to their safety systems and procedures at the same time as they will be changing their commercial and operational systems and procedures. **We would urge Ofgem/DTI therefore to give serious consideration to rolling the current Scottish OC8 forward into the GB Grid Code as a regional variation** until a suitable time after BETTA Go-Live when other changes have bedded down and the requirements for harmonisation can be carefully considered.

I hope that you find these comments useful. Should you have any queries on the points raised, please feel free to contact us.

Yours sincerely,

**Mike Harrison**

Commercial Manager, Trading Arrangements  
ScottishPower Energy Management Limited

## **GB GRID CODE**

### **OPERATING CODE 8 (SGC OC6), OPERATING CODE 11 (SGC OC9) AND BALANCING CODES**

#### **SCOTTISHPOWER UK DIVISION RESPONSE**

##### **1 Operating Code 8**

###### *4.10 Safety Co-ordinators*

- 1.1 We do not support the addition of the Safety Co-ordinators to the Site Responsibility Schedules if this is intended to mean the inclusion of named individuals. Our Site Responsibility Schedules currently detail the control responsibility for each item of apparatus. Exchange of names of authorised safety representatives is dealt with elsewhere.

###### *4.15 – Work in proximity*

- 1.2 We do not foresee any problems with this new provision.

###### *4.18 – Local Safety Instructions*

- 1.3 The term Local Safety Instructions has a specific meaning within the safety systems of ScottishPower UK Division. It is not equivalent to the Local Safety Instructions defined in the EWGC or the proposed definition in the GBGC. The equivalent specification of safety procedures is contained within other documentation at the user site. It does not appear to be appropriate to amend the definition to the effect that where no Local Safety Instructions exist the Local Safety Instructions will be the Safety Rules.

###### *4.22 – Agreement of Isolation and Agreement of Earthing*

- 1.4 We have no objection to the removal of the sections of SGC OC6 covering ‘Agreement of Isolation’ and ‘Agreement of Earthing’.

###### *4.30 – Transfer of control for testing*

- 1.5 We believe that the particular wording in the SGC RISSP process for testing is a reflection of the particular wording used on the ‘Sanction for Test’ form which is issued to the person in charge of the testing. On that form, the Control Person who confirms that the safety precautions have been carried out also confirms that control of the apparatus under test is transferred to the person in charge of the testing. Such a transfer of control cannot take place to allow testing on a cross-boundary circuit without a corresponding transfer of control from the Implementing Safety Coordinator to the Requesting Safety Coordinator. If such a transfer of control is implicit in the agreement “to permit the testing” as specified in the EWGC then we see no difficulties with this change.

###### *4.31 – Emergency Procedures*

- 1.6 The new provisions should avoid confusion should such a situation occur at one of our user sites.

*4.32 (and elsewhere) – Failure to agree the location of safety precautions*

- 1.7 While the Scottish position may be considered to lean more to the achievement of safety than to the commencement of work, it would be helpful if it was complemented by an escalation procedure to avoid deadlock.

*Definition of Earthing*

- 1.8 We are concerned that the proposed definition of Earthing may preclude the use of portable earths as primary earths on the cross-boundary circuit. The SGC definition includes the phrase “where reasonably practicable” in relation to the immobilization and locking of earthing devices; we would prefer this approach to continue in the future.

**2 Operating Code 11**

*5.5 Reduction in response time*

- 2.1 We see no difficulty with the reduction in response time from two months to one.

**3 Balancing Codes**

- 3.1 With regard to the GB Balancing Codes, we would refer you to our response to the GB Grid Code consultation of September 2003 for our arguments regarding the MW limits for small, medium and large power stations and for demand BM Units.