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Our Reference:

Your Reference:

Date : 9th March 2004

Dear Bridget,

## **GB Grid Code OC 8, OC 11, & Balancing Codes - mini Consultation**

Thank you for the opportunity to comment on this mini consultation. We have been involved in the drafting of these codes and therefore have only a few comments to make. The numeric references below are to the consultation document paragraphs. Our comments are as follows.

### **Operating Code 8**

4.32. These comments refer to OC8.8 (Safety Precautions relating to working on equipment near to the HV System). Whilst these will be new provisions to Scotland, the GCEG did not consider this significant. It has been proposed in the consultation to include a regional difference in 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.

- We do not believe that there is a need for this regional variation, that either option would be suitable.

4.33. This paragraph requests comments on whether it is necessary to specify two RISSP-R forms in Appendix A of the existing Grid Codes, that they are very similar.

- We do not see a need for a regional variation, we would be willing to adopt a GB form.

4.34. This paragraph requests comments on whether it is necessary to specify two RISSP-I forms in Appendix B of the existing Grid Codes that they are very similar.

- We do not see a need for a regional variation, we would be willing to adopt a GB form.

4.39. This paragraph refers to the form of the NGT Transmission Permit for Work, Appendix E. It highlights that there is no equivalent SGC form for this. It then requests comments on whether a separate form will be required for each licensed area.

- We believe that the Permit to Work in Appendix A is only an example of an approved Permit to Work from one company and should be described as such, therefore the inclusion of the SHETL and SPTL documents are not necessary.

4.43. This paragraph highlights that SGC OC6 1.2 (Introduction) describes that the Company can agree alternative procedures in place of RISSP. In the consultation document, 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).

- We believe that there is a need to retain this paragraph as a regional variation for Scotland.

4.44. This paragraph highlights that the EWGC OC8.4.2.1 provides for NGC and the User to have Safety Co-ordinators nominated "and at all times" available. In contrast, the SGC OC6 4.3.1 requires them to be available at a timescale agreed in the Connection Agreement. The consultation proposes that the SGC requirement is drafted as a regional difference in GBGC OC8.4.2.1.

- The Scottish Grid Code provides for arrangements with users where sites are unmanned because of the preponderance of these sites in Scotland. Whilst this may not be such an issue in E&W at present with the increase of unmanned renewable generation sites, it is likely to be in the future. We would therefore suggest that the Scottish Grid Code provisions are adopted across GB rather than as a regional variation for Scotland.

4.45. This paragraph highlights that the Scottish Grid Code, OC6 4.3.1 includes that "Users can use trained operators to switch out and make safe circuits before the nominated persons are available on site." However, the EWGC OC8 does not address the switching out or making safe of circuits. The consultation concludes that 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. The consultation document requests views on whether such arrangements as are specified in SGC OC6 could be dealt with in Local Safety Instructions or Connection Agreements.

- In our view, we believe that it is outwith the scope of OC8 and could be removed.

4.50. In this paragraph it is stated that in the Scottish Grid Code, 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. The consultation therefore proposes a regional difference in GBGC OC8.5.1.5 and OC8.8.1.3 to reflect this difference.

- We do not believe that there is a need for this regional variation, that either option would be suitable.

4.52. This paragraph refers to the form in Appendix D which is proposed for use only in England and Wales. The consultation requests views 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.

- We do not believe Appendix D is relevant in Scotland.

## **Operating Code 11**

5.2. In this paragraph it states that 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.

- This issue is being covered through the BETTA Development Group 1 (DG1). The first draft of the Asset Nomenclature high level process is acceptable to SSE and the agreed procedure will feed into the STC drafting.

## **Balancing Codes**

We have raised an issue through the consultation on Licence changes for BETTA, that Ofgem have suggested should be more properly dealt with through the Grid Code. The issue is in relation to hydro generating units that are not capable of providing frequency response due to the limitations on the rate of change of their output because of water management statutory obligations. We had proposed that these generating units should be given relief from the licence obligation to provide Ancillary Services. However, Ofgem's view was that any such relief should be provided for through the Grid Code.

Accordingly, we believe that these units should be treated in a similar fashion as Existing Gas Cooled Reactor Plant under BC3.5, such that they will only operate in Limited Frequency Sensitive Mode. Whilst we understand that Appendix 3 of the Connection Conditions will not apply to Scottish plant with a Completion Date before the BETTA Go-live date, and therefore the capability requirements are understood, clarification that the hydro units will only be operated in this Limited Frequency Sensitive Mode is required, so that it is clear that these generators will never be in breach of their Grid Code obligations.

I hope that you find our comments useful, please give me a call if you wish to discuss any of them further.

Yours sincerely

Rob McDonald  
Director of Regulation