15 June 2004

Bridget Morgan Technical Directorate Office of Gas and Electricity Markets (Ofgem) 9 Millbank London SW1P 3GE Direct tel: -01453 81 3631 Direct fax: 01453 81 2845

Your ref: Our ref:

Dear Bridget

## **<u>GB Grid Code Consultation</u>**

This letter is my response on behalf of Magnox Electric plc to the consultation on the proposed GB Grid Code dated May 2004 (reference 99/04a and associated draft 99/04b) which is currently available on the Ofgem website. Magnox Electric plc is a part of British Nuclear Group, which is the new name for part of BNFL.

My comments are not confidential.

# **Important Issues for British Nuclear Group**

The England and Wales Grid Code has a number of clauses which provide special provisions for nuclear power stations. So too does the Scottish Grid Code. It is an important consideration for us that similar clauses should appear in the new GB Grid Code so that the established way of operating our plant and the existing nuclear safety cases for our power stations are not put at risk. In particular, we wish to ensure that the special clauses that refer to "existing gas-cooled reactor plant" or "existing Magnox reactor plant" in the England and Wales code are retained, and that their meaning is not changed in a way that is detrimental to us. These existing clauses in the England and Wales Code are as follows:

GD Definition of "existing gas-cooled reactor plant" OC2.1.1(d), OC2.2.3, OC2.4.3.2(e), OC2.4.4.1, OC2.4.4.2 BC2.9.4.4, BC2.9.4.6, BC2.9.5.1 BC3.5.3, BC3.5.4(e), BC3.7.6

I am happy that the consultation draft does not affect any of these clauses in a material way, and that they retain the intent of analogous clauses in the Scottish Code.

There are also several clauses in the both the England & Wales Grid Code and the Scottish Code relating to safety of plant, which allowing certain actions to be taken, or certain instructions to be refused, on safety grounds. We also wish to ensure that the intent of these clauses is retained. The clauses concerned in the England and Wales Code are:

CC6.3.13, CC7.7.2 OC2.4.1.3.5(c)(v) OC9.4.7.4(b), OC9.5.2.2(d) BC2.5.1, BC2.5.2.4, BC2.5.4(c), BC2.7.3(a), BC2.7.4(c), BC2.8.3, BC2.8.4(c), BC2.9.2.1, BC2.11.3, BC2A.2.6(Maximum MVAr Output), BC2A.2.6(Maximum MVAr Absorption) BC3.5.5

Again I am happy that the consultation draft does not affect any of these clauses in a detrimental way, and that they retain the intent of analogous clauses in the Scottish Code.

One of our safety specialists has reviewed the new wording of OC8 and its two appendices, and he is satisfied with it.

# **Other Comments**

I have attached to this letter a number of minor drafting comments. I hope these are helpful.

Yours sincerely

David Ward Grid Interface Process Manager Operations Support Unit david.m.ward@magnox.co.uk

## Miscellaneous Drafting Comments on Draft GB Grid Code

In the Glossary and Definitions, "Existing AGR Plant" should refer to Hunterston B

I note that in the Glossary and Definitions, "Existing Magnox Reactor Plant" has had Chapelcross added to the list, which is fine. However, Bradwell, Hinkley Point A and Calder Hall have already permanently ceased generation, and Chapelcross will permanently cease generation before the start of BETTA, so the names of all these stations could be removed from the list. (This is just for housekeeping and is not essential for BETTA)

In the Glossary and Definitions, why does the definition of "Transmission Site" require the site to have a Connection Point? Is it right that substations, cable sealing end compounds etc. on the transmission system which do not have Connection Points are not "Transmission Sites"?

In the Glossary and Definitions, the definition of Transmission System Demand is similar to the previous definition for NGC Demand, and it includes "Station Transformer Demand". I believe that in practice it would only include station transformer demand at Large Power Stations; if so it would be useful to make this clear.

The title of Planning Code Appendix C Part 1 refers to SSE. The reference should be to SHETL, as this is a defined term.

CC6.3.1 states that the conditions in CC6.3 do not apply to Small Power Stations in England & Wales, so by implication they <u>do</u> apply to Small Power Stations in Scotland. Is that the intention?

CC7.7.3 : The inclusion of this paragraph carries with it the implication that in England & Wales it is <u>not</u> the User's responsibility. I am happy with that, but it is it the intention? If so, whose responsibility is it?

In the Table in OC5, under the section on "Harmonic Content" the additional qualifying words "in Scotland" should be removed, as additional words have been added to CC.6.1.5(a) that apply the requirement related to Planning Limits in G5/4 in a general sense and not just to Scotland.

I notice that in OC11 there are no regional differences in the requirements. So does this mean that the existing nomenclature in Scotland happens to coincide with NGC's nomenclature? Or does it mean that a lot of items of plant and apparatus in Scotland will need to be renumbered? It would be helpful if this was explained in the conclusions document following this consultation.

With regard to OC11, I have always thought it a bit of an omission that a summary of the nomenclature itself is not in included with OC11 as an appendix, nor is it in a document that is referenced in the Grid Code. And as far as I know no information about this is to be found on the NGC websites either. I believe it would be a great benefit either to include it in OC11 as an Appendix, or make it a separate document, referenced in OC11, which is maintained and available from NGC's industry information website. (This is not really a BETTA change, although we could argue that it is needed for the benefit of new Scottish users of the Grid Code.)

18 June 2004

Bridget Morgan Technical Directorate Office of Gas and Electricity Markets (Ofgem) 9 Millbank London SW1P 3GE Direct tel: -01453 81 3631 Direct fax: 01453 81 2845

Your ref: Our ref:

Dear Bridget

## **Response to GBGC Additional Matters Mini-Consultation**

This letter is my response on behalf of Magnox Electric plc to the additional matters miniconsultation dated 26 May 2004 (Referenced 116/04) which Louise Elder emailed to me. Magnox Electric plc is a part of British Nuclear Group, which is the new name for part of BNFL.

My comments are not confidential.

# **Duplicate Obligations from Definition of "Genset"**(Section 4 of paper).

I think there is not a material problem here. The slightly revised wording suggested in paragraphs 4.5 and 4.6 appear to me to remove any difficulties.

### Interconnector Provisions in the GBGC (Section 5 of paper)

Clearly, there is no need to include in the GBGC any provision from either the England and Wales Code or the Scottish Codes which refer specifically to the England-Scotland Interconnector or the interconnector between SP (T) and SHETL, since post-BETTA these are no longer interconnectors.

I recall that when the Moyle Interconnector was to be commissioned, the view in the Scottish Grid Code Review Panel was that any requirements of the Moyle Interconnector should be in the Grid Code, for reasons of transparency etc. The details of these requirements, including the timing of data flows, were largely dictated by SONI; they do not necessarily match up with the timing of data flows from other users, so they had to be included separately (see SGC SDC1 sections 6.3 and 7.3). I believe that for transparency such requirements for the Moyle interconnector should be in the GBGC. (The fact that similar requirements for the England France interconnector are not in the E&W code is not an argument for leaving out requirements for the Moyle interconnector. My understanding is that the requirements for the French interconnector are based on agreements between CEGB and EdF which predate the privatisation of the industry, and the French were not willing to have the agreement moved into the Grid Code. Surely for any new interconnector we would want the requirements included in the Grid Code).

## Load Management Blocks (Section 6 of paper)

As I see it, from the system operator's point of view, the only difference between Load Management Blocks (as defined in the Scottish Grid Codes) and Customer Demand Management (as defined in the Draft GB Grid Code) is that the definition of Customer Demand Management refers to planned <u>reductions</u> of consumer demand. By contrast, Load Management Blocks can also be planned increases in demand, although this is not specifically stated.

This is really a question of what information the system operator needs. If the system operator needs to know about Customer Demand Management greater than 12MW in E&W and 5MW in Scotland, then I would expect the system operator to want to know about the switching of Load Management Blocks of similar size. This could easily be incorporated in the Grid Code wording by a slight change to the definition of Customer Demand Management to something like the following:

"Reducing or increasing the supply of electricity to one or more customers, or connecting or disconnecting one or more customers in a manner agreed for commercial purposes between a supplier and its customers."

(As an aside, I have noticed one related oddity of the Grid Code, which I would like to draw to your attention. Under the England and Wales Code, and the Draft GB Grid Code, Demand BM Units with a demand capacity less than 50MW do not have to submit PNs. However, Customer Demand Management greater than 12 MW in E&W and 5MW in Scotland must be notified. Hence for smaller demands, it is required to notify certain planned changes in demand, even though it has not been necessary to notify the magnitude of the original demand before Demand Management.)

### Data Registration Code – Regional Differences (Section 7 of paper)

The proposed changes to the DRC seem reasonable. But I don't understand why negative sequence resistance is required in Scotland, if it is not required in England. (I hope that it will not be required in future in England and Wales, since I do not believe we have this data item for any of our generating units!)

I hope my comments are helpful

Yours sincerely

David Ward Grid Interface Process Manager Operations Support Unit david.m.ward@magnox.co.uk