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Dear David

**Planning and operating standards under BETTA
An Ofgem/DTI consultation document (156/04)**

We are pleased to have the opportunity to comment on the proposals for the harmonisation of transmission operating and planning standards.

We accept and support the over-riding criteria that in moving towards conformed standards, it is not intended that any changes should result in any significant investment in the transmission system. In particular, we believe it is important for the GB system operator to have a common set of rules for application in undertaking security assessment studies from day one of BETTA.

We are pleased to see the progress that has been made, in that a single document, the GB Transmission System Security and Quality of Supply Standard (SQSS), is proposed for day one of the BETTA implementation.

On the interaction between a Distribution System Operator and the Transmission System Operator, in relation to ancillary services, the distributed generation debate is introducing the concept that a managed distribution network might buy in services from embedded generators to maintain system security and stability within limits. While there is still a way to go on this issue, it should be recognised that this could cause problems if the transmission operator does not have visibility of the factors that have affected the demand requirements on the distribution system. We recognise that this is a consideration primarily for the Grid Code, but are taking this opportunity to raise the concern now.

It is good to note that Ofgem/DTI have not identified any parts of the draft GB SQSS developed by the transmission licensees that do not meet with the objective to harmonise existing standards. We agree that this draft GB SQSS should form the relevant standards for application to the transmission licensees under BETTA.

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With a view to enhancing the GB-SQSS drafting, we have offered some minor comments on this at the end of this letter for your consideration. The list of comments is by no means exhaustive.

If you wish to discuss any aspect of this letter, please do not hesitate to contact Paul Chesterman on 020 7752 2527 or myself.

Yours sincerely

Roger Barnard

Regulatory Law Manager

Please see attachment

Attachment

These are some comments from EDF Energy on the drafting in Volume 2 of Planning and Operating Standards under BETTA (156/04):

General: power quality for a modern power system is assessed in terms of voltage, frequency, and harmonics. However, there seems to be no reference to harmonics in the GB-SQSS.

Section 7: there should be definitions for NGC, SPL, and SHETL, and of their areas, for completeness.

Page 8, clause 2.6.3: there seems to be a minor language problem with the provision that “the loss of power infeed shall not exceed the normal infeed loss risk”. We consider that the term “normal infeed loss risk” may not be adequate. In fact “risk” is normally assessed in terms of likelihood, but we believe that here it actually means a MW threshold. There are similar issues in a number of other similar terms.

Page 27, table 6.4, row 2, column 2: We think that “Notes 1, 2” should be changed to “Notes 1, 2, 3” as loss of a supergrid transformer should be included.

Pages 29–30: if “NGC” is replaced by “System Operator” in Ancillary Services and Balancing Services, and indeed other similar terms, there will be a need to define “System Operator”.

Page 31: the definition of “Fault Outage” does not include the concept of outages caused by a non-automatic switching operation which is consequential to an automatic action on another item of apparatus. This issue may need to be addressed.

Page 36: the definition of “Operational Intertripping” should mention under what circumstances intertripping is allowed to happen.

Page 40: at the end of the definition of “Voltage Collapse”, the words “across a significant part of the transmission system” should be added.

Page 52, clause E.2.4: costs paid to generators/users for some of the intertripping and transmission faults may also be included as opex items.