

Change proposal:	Grid Code [Grid Code D/09]: Grid Code Requirements for OC6.6 (Automatic LFDD)		
Decision:	The Authority ¹ approves the proposed changes to the Grid Code ²		
Target audience:	National Grid Electricity Transmission PLC (NGET), Grid Code users and other interested parties		
Date of publication:	27 January 2010	Implementation Date:	10 February 2010

Background to the change proposal

A system incident (exceptional loss of generation) on 27 May 2008 triggered the operation of the first stage of the automatic low frequency demand disconnection (LFDD) scheme. Subsequently an Energy Emergency Executive Committee (E3C)³ task group led an investigation. One of the recommendations from the E3C task group investigation was that the Grid Code requirements of Operating Code ('OC') 6.6 should be reviewed to identify areas where improvements could be made to the LFDD scheme.

A Grid Code Review Panel (GCRP) working group was established (the OC 6.6 Automatic LFDD Working Group) to undertake this review. The Working Group considered a wide range of aspects of the LFDD scheme including those that are defined in processes and procedures that are outside the scope of the Grid Code.

The Working Group made recommendations for improvements to the definition of the LFDD scheme and also practical measures to improve its effectiveness. A Grid Code change proposal (D/09) was raised with details of changes to the Grid Code that NGET and GCRP considered would improve the effectiveness of the LFDD scheme. Other Working Group recommendations have already been actioned by NGET by direct correspondence with Distribution Network Operators.

The change proposal

NGET, with the assistance of the Working Group, developed proposed Grid Code changes that were intended to clarify the LFDD scheme requirements. Following agreement from the GCRP, NGET consulted on Grid Code change proposal D/09.

D/09 proposes changes to:

- clarify requirements (defined in OC6 and the Connection Conditions) for total scheme operating time and for the size of demand that should be within each stage.
- improve consistency of data submitted to NGET by relevant Grid Code users (defined in the Data Registration Code as a new schedule).

NGET considers that D/09 would provide additional clarity about LFDD scheme requirements and would ensure that those requirements are consistently interpreted by

¹ The terms 'the Authority', 'Ofgem' and 'we' are used interchangeably in this document. Ofgem is the Office of the Gas and Electricity Markets Authority.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ The E3C is a body of experts drawn from across the gas and electricity industries and from government, agencies and regulators to undertake detailed emergency planning activities for national gas and electricity emergencies.

Grid Code users. NGET considers that improving clarity of LFDD scheme requirements will promote security and efficiency of electricity generation, transmission and distribution systems.

NGET advised that the D/09 proposal does not have consequential impacts on other industry codes.

NGET's recommendation

NGET submitted a final report to the Authority with a recommendation that change proposal D/09 is implemented⁴. NGET subsequently made some further minor changes to the legal drafting associated with D/09 that replace references to the GB Transmission System with National Electricity Transmission System ('NETS') and also align the text with the version of the Grid Code applicable after the Go Active date (24 June 2009) for introduction of the offshore transmission regime. The report was re-submitted.

The Authority's decision

The Authority has considered the issues raised by the change proposal and in the final revised Report dated 18 December 2009. The Authority has considered and taken into account the responses to NGET's consultation on the change proposal which are included in the final Report⁵. **The Authority has concluded that:**

- 1. implementation of the change proposal will better facilitate the achievement of the applicable objectives of the Grid Code⁶; and**
- 2. approving the change is consistent with the Authority's principal objective and statutory duties⁷.**

Reasons for the Authority's decision

Promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole

We note that the changes in proposal D/09 clarify the performance requirements for the LFDD scheme. We consider that additional clarity in respect of performance requirements will promote consistency in the application of those requirements and therefore enhance the performance of the LFDD scheme. We acknowledge that the primary purpose of the LFDD scheme is to protect the security of the electricity system as a whole. We therefore agree that D/09 changes would better facilitate the achievement of this Grid Code objective.

Other issues

We note that no respondents were opposed to the intent of the D/09 change proposal.

⁴ Issue 1.0 was submitted on 11 December 2009.

⁵ Grid Code proposals, final reports and representations can be viewed on NGET's website at: <http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/>

⁶ As set out in Standard Condition C14(1) of NGET's Transmission Licence, see: http://epr.ofgem.gov.uk/document_fetch.php?documentid=14343

⁷The Authority's statutory duties are wider than matters which NGET must take into consideration and are detailed mainly in the Electricity Act 1989.

One respondent did not agree with the proposal to define the LFDD scheme requirement in terms of forecast demand at the time of NETS peak. We note NGET's view that this is consistent with its interpretation of the current requirements. We also note that such an obligation would be consistent with demand forecasting required by Planning Code requirements.

Another respondent questioned whether the approach of defining the size of demand shedding groups based on peak demand conditions was effective at other demand conditions. We note that this had been considered by the working group and the variation in performance for different demand conditions was not considered significant.

One respondent requested a specific exclusion in respect of retrospective application of the total scheme operating time requirement. We note that NGET revised the Grid Code change proposal to provide this clarification about the intended application of the newly defined performance requirement.

We agree that approving the D/09 changes would be consistent with the Authority's principal objective and statutory duties.

Decision notice

In accordance with Standard Condition C14 of NGET's Transmission Licence, the Authority hereby approves change proposal Grid Code D/09: Grid Code Requirements for OC6.6 (Automatic LFDD).

Stuart Cook
Senior Partner, Transmission and Governance

Signed on behalf of the Authority and authorised for that purpose.