

LCNF Full Submission

Supplementary Answer Form

DNO Name:	Electricity North West Limited	Question Number:	ENWL006
Question Date:	14 Sept 2010	Answer Date:	15 Sept 2010
Question Topic:	ER P2/6		

Original Question No:		Original Answer Date:	
Original Question:			
Original Answer:			

Question:	Please give an example of the type of the type of "technical infringement" envisaged and explain why a derogation would be needed if there is no "material deviation".
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Answer:	<p>In our submission we were reserving our position for unforeseen, but technical, infringements, ie those without material risk to customers.</p> <p>As these are unforeseen it is difficult to give a precise view of what these would be. However there are a couple of examples that might illustrate the need to have a pragmatic approach.</p> <p>In the recent revision of ER¹ G59/2 and the Distribution Code, the old DPC² 7.4.4 in relation to negative phase sequence withstand for generators was drafted in 1990 and had never been updated. The emergence of windfarms has brought forth a range of generators that technically cannot comply with the old requirement.</p>
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¹ ER – Engineering Recommendation

² DPC – Distribution Planning and Connection Code

	<p>The system requirements are actually covered off in CC³ 6.3.3 of the Grid Code, and thus the old DPC²7.4.4 was essentially a redundant clause, but causing theoretical infringement. The revision of ER¹ G59 has removed this problem, but it is indicative of a hidden, but non-material, technical issue that might come to light.</p> <p>Another example is how is measured demand under a Demand Side Management (DSM) regime to be treated for ER¹ P2/6 compliance. It is not latent demand as envisaged by ETR⁴130, although its effect is the same. Again as DSM was not envisaged when ER¹ P2/6 was written, we will need to guard against an interpretation of it that leads to a technical infringement, when in fact, there is no increased risk, or at least no inappropriate, increased risk to customers.</p> <p>If either we, or Ofgem, spotted such technical infringements as we develop our plans, we would expect to see a pragmatic treatment to avoid stalling the projects.</p>
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Attachments:	n/a
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³ CC – Connections Code

⁴ ETR – Engineering Technical Recommendation