

Your ref GSR0008

Our ref

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1 June 2012

Dear Sheona

National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS): proposed modification (GSR008)

I am writing on behalf of both Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc. Northern Powergrid supportive of the proposed change to the NETS SQSS in that it seeks to increase the alignment with Engineering Recommendation P2/6 which should help to address some of the uncertainties when carrying out a security assessment at the National Grid / Distribution Network Operator interface. We appreciate that there is further work required to address the remaining issues in this area however we believe that minor refinement to the proposed draft would help to reduce the uncertainties at this stage.

Detailed comments on section 3 of the proposed NETS SQSS are included in the attached table. These mainly relate to the inclusion of a de minimis size of embedded generator (small power station) below which it is reasonable to disregard the impact it has on the demand and on its ability to provide generation security. In ER P2/6 a figure of 5% of the group demand is used.

If you would like to discuss the contents of this letter, please do not hesitate to contact me or Alan Creighton at alan.creighton@northernpowergrid.com or 01977 605920

Yours sincerely

Sent by email 1 June 2012

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Head of System Strategy

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Reference	Comment
General	Terms such as Small Power station, Medium Power station, Large Power station, Group Demand etc. where they are being used as defined terms should be italicised.
3.5.1 Bullet 1	The paragraph applies where there are no 'power stations of any size'. Whilst the term 'power station' is not italicised and therefore is not a defined term it could be construed as being such. If it was considered to be a defined term then any apparatus generating electricity (including domestic PV) would be included. It would be helpful to clarify if this is the intention or whether there is intended to be a de minimis level as is the case in ER P2/6 e.g. where there are no power stations greater than say 5MW.
3.5.1 Bullet 2	Again it would be good to clarify if a de minimis limit was envisaged as any home with a PV might be considered to be a 'composite user'. It would also be worth clarifying if the intent is that the site never exports – The generation may not exceed the on-site demand under normal operating conditions, but may exceed it at times of lower demand.
3.5.2	<p>Small power stations are defined as anything less than 50MW; again it would be good to understand if there should be a de minimis level of generation below which the effect of generation on demand should be disregarded.</p> <p>As drafted this paragraph explains an issue to be aware of, but in 3.5.3.1 it is implied that the paragraph provides guidance on what how to establish the group demand; it doesn't really do this. It would be more helpful to indicate that where small or medium power stations are embedded in a network the analysis should consider the materiality of demand masked by embedded generation.</p>
3.5.3.1	The relevance of the text 'where relevant for system connectivity and power flows' is unclear. Is it required?
3.6	It's unclear what the 'transmission capacity for the connection of a demand group' actually is. Does it mean 'The capacity of the onshore transmission system at a connection site....'
3.6.3	If the output from small and medium power stations is netted off by the DNO in presenting the demand that can be expected to be imposed on the onshore transmission system then a security contribution from them is implicitly taken into account. The effective security contribution however is whatever their output just so happened to be at the time of the net GSP peak – which could be more or less than that arising from a P2/6 security assessment. If there was a material amount of generation present the implied contribution could be pessimistic or optimistic. P2/6 addresses this by explicitly requiring the gross demand to be assessed together with an explicit assessment of the generator security contribution. It would be helpful at this stage to include guidance that the materiality of the small and medium generation should be considered.
3.6.4	Typo – the paragraph should start 'the security contribution from a Large Power Station...'
3.6.5	It's not clear why the sentence 'Any transfer capacity declared by the Network Operators for use in planning timescales must be available for use in operational timescales' been removed. I recall that this issue was raised in the B07 Working Group as there was a concern that only transfer capacity that would or could be used in practice (rather than theoretically)

	should be considered.
3.9.4	Should a trip of a generation circuit be included in the list of events?
Table 3.1 Note 1.	It would be good to clarify if there was a de minimis size of generating unit that should be considered. The planned outage could also be a generation circuit.
3.13	Given the implicit assumptions made in the security assessment of small and medium power stations, where the network assets alone provide insufficient security, it would be appropriate to make a more robust assessment of their security contribution as well as that from large power stations.
3.14	It's unclear what's meant by the term 'local power station'
3.15	Typo – the sentence should read '...detailed in section 3.14'
Table 3.2	It is good that there is consistency of the security contributions from generation with P2/6, although it must be recognised that the P2/6 contributions were assessed some years ago and probably should be refined. There are however some generation technologies which are not included in P2/6 and it's unclear what analysis has been done to establish these figures.