

Change proposal:	Grid Code change proposal B/10: Record of Inter-System Safety Precautions (RISSP)		
Decision:	The Authority ¹ directs that the proposed change to the Grid Code ² be made		
Target audience:	National Grid Electricity Transmission PLC (NGET), Relevant Transmission Licensees, Grid Code users and other interested parties		
Date of publication:	6 September 2012	Implementation Date:	To be confirmed by NGET

Background to the change proposal

Operating Code 8 (OC8) of the Grid Code specifies the standard procedures needed to coordinate, establish and maintain safety precautions when work is carried out on or near the National Electricity Transmission System (NETS) or a user's system. Safety precautions are needed as work cannot be carried out safely on High Voltage (HV) equipment without them.

A written record is kept of the safety precautions taken in accordance with the provisions of OC8. This record is known as the Record of Inter-System Safety Precautions (RISSP). A RISSP form is issued when work is carried out on HV equipment. When the party issuing the RISSP form is acting in its capacity as the 'Requesting Safety Coordinator', the form is known as the RISSP-R. The format of the RISSP-R form is set out in OC8:

- for work to be carried out on or near the England and Wales Transmission System, the relevant provision is in OC8A.4.3.5; and
- for work to be carried out on or near the Scottish Transmission System, the relevant provision is in OC8B.4.3.5.

The OC8 provisions above state that the format for the identifying number written or printed on the RISSP-R form should comprise:

- a prefix identifying the location of the work;
- a unique serial number of four digits; and
- a suffix 'R'.

NGET's current operational practice when issuing RISSPs does not align with this format and uses a larger number of characters than that specified. The two owners of the Scottish transmission networks have also identified that use of a larger number of characters would be better.

The change proposal

NGET discussed potential changes to the currently specified format in the RISSP-R form with the Grid Code Review Panel (GCRP) during 2009. The GCRP agreed with NGET that it should consult on proposed changes to OC8. NGET raised Grid Code change B/10 and issued a consultation in February 2010.

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.

B/10 proposes to amend the relevant OC8 provisions so that the format in the RISSP-R form would consist of the prefix, a unique serial number (the prefix and serial number together using up to eight characters (including letters and numbers)) and the suffix 'R'.

NGET consulted on the proposal. All respondents supported the change but one respondent sought clarity on two aspects of the proposed change:

- whether the revision to the RISSP identifier would apply only to transmission licensees or also to users who may also be the 'Requesting Safety Co-ordinator' in some cases; and
- clarity around the format of the identifier – whether the new proposed limit of the serial number (NGET stated this to be eight alphanumeric characters) would include or exclude the issuing location prefix.

NGET's response confirmed that the revision to the RISSP identifier would apply to both transmission licensees and users who are the 'Requesting Safety Co-ordinator', and that the new proposed limit of the serial number would include the issuing location prefix (NGET noted that this is typically 3 characters or less).

In December 2011, we asked NGET to confirm whether the views of offshore transmission parties had been considered in developing the proposed solution; in its final Report NGET confirmed that it had and provided further details of those views.

NGET's recommendation

In NGET's view, B/10 would better facilitate Grid Code objective (i) as the format of the identifier contained in OC8 would better reflect current operational practice and clarify the appropriate identifier format to use. The changes to OC8 would therefore permit the development, maintenance and operation of an efficient and economic transmission system.

The Authority's decision

We have considered the issues raised by the change proposal and in the final Report³ dated 1 August 2012. We have considered and taken into account the responses to NGET's consultation on the change proposal which are included in the final Report. We have concluded that:

1. implementation of the change proposal will better facilitate the achievement of the objectives of the Grid Code⁴; and
2. approving the change is consistent with our principal objective and statutory duties⁵.

³ Grid Code proposals, final reports and representations can be viewed on NGET's website at:

<http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/>

⁴ As set out in Standard Condition C14(1)(b) of NGET's Transmission Licence, see:

<http://epr.ofgem.gov.uk/Pages/EPRInformation.aspx?doc=http%3a%2f%2fepr.ofgem.gov.uk%2fEPRFiles%2fElectricity+transmission+full+set+of+consolidated+standard+licence+conditions+-+Current+Version.pdf>

⁵ The Authority's statutory duties are wider than matters which NGET must take into consideration and are detailed mainly in the Electricity Act 1989 as amended.

Reasons for our decision

We note that responses to the NGET consultation on B/10 all supported the proposal, subject to the additional clarifications sought by one respondent. In our view, the proposal better facilitates Grid Code objective (i) and is neutral against all the other Grid Code objectives.

Grid Code objective (i) 'to permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity'

In our view, the proposed changes to OC8 to clarify the identifier format to be used on the RISSP-R form are appropriate for the following reasons:

- we agree that a consistent and uniform approach in applying a particular format helps avoid confusion for transmission licensees and users. We also agree that reflecting current operational practice in OC8 helps improve the clarity of the RISSP format; and
- we note that the proposed changes to the format increase the number of characters used by possibly one or two as NGET has confirmed that the location identifying prefix and the serial number will together use up to eight characters. This seems only a marginal improvement to the current format. However, we also note that the current format is restricted to the use of four digits in the serial number. The use of a 'letters and numbers' format may provide greater flexibility and future proofing to the format which limits the need for further changes for some time. There would be a benefit for users and transmission licensees to accommodate the revised format with limited and low cost adjustments to their IT systems.

Having a consistent approach assists in the efficient operation of transmission networks, and, for the reasons above, we agree that the proposal better facilitates this Grid Code objective.

Decision notice

In accordance with Standard Condition C14 of NGET's Transmission Licence, the Authority hereby directs that change proposal *Grid Code B/10: 'Record of Inter-System Safety Precautions (RISSP)'* be made.

Andrew Burgess

Associate Partner, Transmission and Distribution Policy

Signed on behalf of the Authority and authorised for that purpose