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Dear Ian

## Authority decision to direct that the report on Grid Code modification proposal GC0050 "Demand Control and OC6" be revised and resubmitted

On 7 March 2014, National Grid Electricity Transmission Limited (NGET) submitted its report to the Authority (the "report") for Grid Code modification proposal GC0050, "Demand Control and OC6".

We consider that, because of the deficiencies identified below, we cannot form an opinion on GC0050 based on the report as submitted and that, in accordance with paragraph 4A(a) of standard licence condition C14 (Grid Code) of the Electricity Transmission Licence, we should direct that it must be revised and resubmitted by NGET.

We have identified the following deficiencies in the report:

- 1. There is a contradiction in the report regarding the required time to implement voltage reduction. The report notes that modern SCADA systems can reduce implementation times (paragraph 4.9) and yet the proposal in the modification is to extend them. This contradiction needs to be explained and justified.
- 2. The report explains that the Grid Code currently requires a response time that "has never actually been achievable" (paragraph 4.10). This should be better explained. Why has this flaw been allowed to persist until now?
- 3. The report says that NGET's Electricity National Control Centre (ENCC) remains of the view that the 5 minute implementation time is still a requirement (paragraph 4.12). However, the proposal is to extend this. The report needs to explain fully ENCC's position with regard to this modification proposal.
- 4. The footnote 2 on page 8 of the report needs to be further clarified. It would be helpful if there was a section in the report explaining the testing that has taken place (project Jupiter). Also, the report gives the impression at some points (e.g. paragraph 4.10, bullet 1) that a 3% voltage reduction delivers a 3% demand reduction. It is understood that the results from project Jupiter do not support this. The report should be consistent in its view on the relationship between voltage reduction and load reduction. It should also provide convincing evidence that its provisions will deliver the required demand reductions, taking full account of the results from project Jupiter.
- 5. It is noted that in the proposed legal text, the percentages in the two bullet points in sub-clause (ii) of paragraph OC6.5.3 refer to different quantities (i.e. voltage and

demand). NGET should consider whether this is sufficiently clear and whether the allowed voltage reduction should be specified as a single number rather than a range.

We therefore direct that the report be:

- revised to address the points listed above (including in discussion with the GC0050 workgroup and/or undertaking further consultation if NGET/the GCRP considers either to be appropriate);and
- resubmitted.

Yours sincerely

Gareth Evans Head of Profession Engineering