

## Grid Code Compliance Working Group

Meeting Name	Grid Code Compliance Working Group
Meeting No.	3
Date of Meeting	23 <sup>rd</sup> June 2008
Time	10:00am – 3:00pm
Venue	Room B2.1, National Grid Offices, Warwick

This note outlines the key points from the third meeting of the Grid Code Compliance Working Group

### Members Present:

Mark Perry	MP	Chairman
Richard Dunn	RD	Secretary
Helge Urdal	HU	National Grid
Steve Hoar	SH	National Grid
Mark Lyon	ML	Scottish Power Networks
John Norbury	JN	RWE Trading
John Morris	JM	British Energy
Damien McCool	DM	Scottish Power Renewables
Bridget Morgan	BM	Ofgem

### Apologies:

Mike Kay	MK	North West Electricity
Chris Berry	CB	Scottish Power Networks
Mick Chowns	MC	RWE Trading
Claire Maxim	CM	E.On
Kathryn Sorrell	KS	National Grid

### 1. Introductions/Apologies for Absence

1. Apologies for absence were received from Mike Kay, Mick Chowns, Chris Berry, Claire Maxim and Kathryn Sorrell.
2. MP welcomed ML who was attending on behalf of CB.

### 2. Draft Notes of the Working Group Meeting held on 8<sup>th</sup> April 2008

3. The change-marked draft notes of the second meeting of the Group held on 8<sup>th</sup> April were agreed.

### 3. Working Group Terms of Reference (TORs)

4. RD explained that the Group's Terms of Reference had been approved at the May meeting of the GCRP. The Panel had agreed that the Working Group should aim to complete its work by February 2009.
5. The Working Group noted the revised Terms of Reference.

### 4. Transfer of Performance Requirements from Compliance Process to Grid Code – Working Group Report

6. HU reported that the Working Group Report had been well received at the GCRP on 15<sup>th</sup> May but Panel Member David Ward (Magnox Electric) wanted to understand better the nature of the conclusion that the Working Group had reached on the "Verification/Validation" issue. The Panel had agreed that the Industry Consultation should proceed when David Ward was in a position to understand the conclusions of the Working Group and also keep JN informed of developments. National Grid had

subsequently provided some revised drafting to David Ward to clarify the issue further and awaited his response subject to which National Grid would proceed with the consultation.

**Action: National Grid (HU)**

### **5. Governance of the Compliance Process (Discussion Proposals by National Grid)**

#### **Revised Legal Text for Interim Operational Notification (ION), Energisation Operation Notification (EON) and Final Operational Notification (FON)**

7. The Group considered the Glossary and Definitions. HU confirmed that the baseline for the drafting was the previously agreed version of the revised legal text. HU confirmed that National Grid envisaged that the Compliance Statement would form an attachment to the Self-Certification sheets. JM asked how tenderers could be informed of the Grid Code requirements. HU indicated that the information would still be in the Guidance Notes but would also be provided when the Project commenced. The Guidance Notes would need to be re-drafted to reflect the Authority's approval of G/06 and later the outcome of the Compliance discussions and the Offshore regime. JN believed that the "relevant Grid Code provisions" should be replaced with the "Connection Conditions". HU suggested it was wider than just the CCs and preferred retention of the current wording. BM suggested that the drafting should make it clearer if it was intended that National Grid should be the arbiter of what was relevant in this context.
8. DM suggested that "date of the issue of the ION" could replace "certain date" in the drafting and this was agreed. Under User Self-Certification of Compliance JN indicated that he would prefer a reference to "relevant requirements of the Grid Code". JN suggested that National Grid were "specifying" the UDL rather than "providing" and this was agreed.
9. On the Connection Conditions (CC), JN suggested the use of "a" generator rather than "any" in CC1.2. This was agreed. In CC4.2, JN suggested the word "Test" rather than "testing" and this was agreed. HU explained that the process was more easily followed by referring to the diagram in the drafting for Limited Operational Notification (LON). JN suggested that the diagram could be described as "Illustrative" and this was agreed. BM suggested that references to the DRC could be included to assist the reader. This was agreed.
10. In response to a suggestion from JN, HU agreed to consider a revised description of the task box "Design" in the diagram more on the lines of "User/NGET activities". On CC4.2 MP indicated that CM had provided some comments in advance of the meeting and as a result National Grid was proposing a new CC3.6. HU indicated that Modifications had not generally been taken into account in the drafting but National Grid would address this in the next batch of drafting. Minor amendments were agreed to CC4.3.1 ("first" synchronisation and CC4.3.3 and CC4.3.4). BM questioned the treatment of a generator wishing to connect earlier than the 28 days mentioned in CC4.3.1. HU agreed to consider revised drafting to cater for this situation.
11. The Group discussed the rationale for the 24 month period specified for the expiry of an ION in CC4.3.5. It was agreed that there was a need to maintain pressure on the developer in the context of the compliance regime. However, the current wording was a rather blunt instrument and perhaps the detail of what happens during delays could be better expressed in the ION itself. National Grid agreed to review the drafting in this section.
12. JN asked what would actually be provided with an ION and HU agreed to look at the drafting in CC4.2 to spell this out more clearly. In CC4.3.6 and CC4.3.7 JN suggested deletion of "a number " in the text. On CC4.3.7 HU confirmed that further

drafting on frequency control tests would be provided with the next batch of drafting. BM questioned the treatment of an ION issued earlier than the 28 days set out CC4.3.9. JN raised a number of concerns with the term “Unresolved Compliance Issues” and would prefer the term “Outstanding”.

13. Rather than User Data Library Structure in CC5.2.5 it was agreed that the reference should be to the User Data File Structure. JN expressed concern over the wording “completed to NGET’s satisfaction” and “authorised signatory of the User” in CC5.3.1 (e) and 5.4.1 (e). HU agreed to redraft the wording and make the requirement in CC5.3.1 more visible. HU would also consider the words “must/will” and make them more neutral on the lines of “are to be carried out”.

### **New text for Legal Drafting for Limited Operational Notification (LON)**

14. The Group discussed the wording in the diagram that was currently unacceptable and the merger of a number of the existing text boxes. In response to a question from JN, HU confirmed that the UDL was intended to last for the lifetime of the plant. In due course it would be made more visible via website arrangements. HU agreed that there was no need for a UDL for every project and the text would make this clearer in due course.
15. HU agreed that the text of CC1.3 would be reviewed to try to avoid use of the word “process” too often. HU also agreed to review the wording in CC4.4 that mentioned “a material adverse effect on the business or condition of NGET or other Users ....”. In the context of CC4.4.1 and as noted earlier the details of what happens if non-compliance continues could be dealt with better in the LON itself. HU would also review the wording in CC4.4.2 relating to “joint investigations” and the wording in CC4.4.3 requiring the Generator or DC Converter Station to operate at certain output in order to give the Generator more choice in the matter

### **6. Compliance Process – Note regarding Embedded Generation**

16. SH presented this paper by National Grid. The essence of the paper was that National Grid were suggesting a mechanism whereby the Grid Code requirements as currently imposed on LEEMPS would remain, but that National Grid would undertake the compliance assessment of those requirements in place of the DNO at the election of the DNO via the Statement of Works process. The Grid Code would need to provide that National Grid would have an arrangement with a DNO that elects to make National Grid responsible for the Compliance of the LEEMPS in their area. There would also be changes required to the Distribution Code, the CUSC and the DCUSA.
17. Working Group Members generally agreed that the National Grid proposals were in the right direction and aligned with the preferences of the DNOs in this area. It was agreed that National Grid would now proceed to draft the provisions in the Grid Code to give effect to this approach.

**Action: National Grid (HU/SH)**

### **7. Next Steps**

18. MP summarised the work to be undertaken for the next Working Group meeting:
  - National Grid would re-consider the drafting on the ION/EON/FON arrangements in the light of the comments made at the meeting and also address changes necessary to accommodate modifications;
  - National Grid would continue to develop the drafting on the LON arrangements (Working Group Members would also be invited to provide any further comments on the drafting);
  - National Grid would bring the two sets of drafting together in one document for the next meeting of the Group;
  - National Grid would provide Grid Code drafting for the next meeting

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to allow the DNO to elect that National Grid carry out the Compliance process for LEEMPS stations in their area.

**Action: National Grid (HU/SH)**

19. HU reminded the Working Group that the Group still needed to progress work in due course in the following areas:

- Specification of Simulations
- Specification of Tests required & Performance Acceptance Criteria
- Relationship with OC5
- Power Park Unit Type Testing & Registration

### **8. Date of Next Meeting**

20. The next meeting of the Group will be held on 2<sup>nd</sup> September 2008 at NGH commencing at 10am.