

Grid Code Industry Consultation Response Proforma

GC0044 Grid Code changes resulting from BSC modification P276

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses by **5th June 2013** to Grid.Code@nationalgrid.com. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

These responses will be included in the Report to the Authority which is drafted by National Grid and submitted to the Authority for a decision.

Respondent:	Kathryn Coffin, Senior Market Advisor (kathryn.coffin@elexon.co.uk)
Company Name:	ELEXON Limited (the Balancing and Settlement Code Company)

Industry Consultation Questions

1.	Do you agree with the proposed changes to the Grid Code?	Yes. ELEXON has reviewed the proposed Grid Code legal text for its consistency with: <ul style="list-style-type: none">• The approved P276 BSC legal text (as attached to the P276 Final Modification Report); and• The P276 Workgroup's intended solution (as documented in the P276 Final Modification Report).¹ We believe that the proposed Grid Code provisions are consistent with P276, based on our review and our earlier discussions with National Grid on the intention of the Grid Code wording.
2.	Do you believe that GC0044 better facilitates the Applicable Grid Code Objectives? Please include your reasoning.	Yes, we agree that GC0044 will better facilitate Applicable Grid Code Objectives (i), (ii) and (iii) for the reasons stated in the consultation document.

¹ For reference, the P276 Final Modification Report is published on our website at:
<http://www.elexon.co.uk/mod-proposal/p276-introduce-an-additional-triggerthreshold-for-suspending-the-market-in-the-event-of-a-partial-shutdown/>

3.	<p>Do you support the proposed implementation approach? If not, please state why and provide an alternative suggestion where possible.</p>	<p>Yes, however we are a little confused by the proposed implementation approach for GC0044 as given in the consultation document:</p> <p><i>“National Grid proposes GC0044 should be implemented <u>no later than</u> 31st March 2014, in line with changes to be made to the BSC, according to the direction given within the Authority’s decision as part of the P276 BSC Modification”.</i></p> <p>We recommend that GC0044 is implemented <u>on</u> 31 March 2014, as this is the P276 Implementation Date approved by Ofgem and therefore the date that the approved BSC legal text becomes effective. If the Grid Code legal text is implemented earlier then this will result in inconsistent Black Start provisions between the Grid Code and the BSC.</p>
4.	<p>Do you have any other comments?</p>	<p>Yes.</p> <p>National Grid’s advice to the P276 Workgroup was that, during a Partial Shutdown in which the Balancing Mechanism continues:</p> <ul style="list-style-type: none"> • All instructions given by National Grid within the shutdown area will be Emergency Instructions under Grid Code BC2.9.1.2(e)(i); and • Outside the shutdown area, National Grid will be issuing a mixture of Emergency Instructions, normal Bid Offer Acceptances and Balancing Services Adjustment Actions. Some of the Emergency Instructions issued by National Grid outside the shutdown area may fall under BC2.9.1.2(e)(i) but others (e.g. MaxGen or Emergency Deenergisation) may not. <p>The P276 Workgroup’s intention was that only those instructions issued under Grid Code BC2.9.1.2(e)(i) should be eligible for black start compensation under the BSC (see Sections 3 & 4 of the P276 Final Modification Report). BC2.9.1.2(e)(i) in turn refers to “the need to invoke the Black Start process or the Re-Synchronisation of De-Synchronised Island process in accordance with OC9”.</p> <p>In practice, the proposed Grid Code provisions place responsibility on National Grid to decide:</p> <ul style="list-style-type: none"> • When to specify that an OC9 instruction to a Black Start Station or a Network Operator, which is part of an invoked Local Joint Restoration Plan, <u>is not</u> an Emergency Instruction; and

		<ul style="list-style-type: none">• When to specify that an OC9 instruction to a User, who is not part of an invoked Local Joint Restoration Plan, <u>is</u> an Emergency Instruction. <p>We suggest that it may be useful for National Grid to provide some further guidance in this area as part of the GC0044 report to the Grid Code Review Panel and Ofgem and/or during implementation.</p> <p>While not directly a Grid Code matter, we note that the P276 Workgroup also recommended giving consideration to extending the CUSC Interruption Payment provisions to cover any Settlement Periods during Partial Shutdowns in which the Balancing Mechanism is not suspended (see Section 4 of the P276 Final Modification Report). Although the P276 solution does not require a CUSC change, if one is to be progressed then implementing it in parallel with P276 and GC0044 would give the industry maximum certainty of the rules.</p>
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