

# **CONSULTATION DOCUMENT**

CUSC Amendment Proposal CAP124
Clarification of the withholding of payments for
Operational Intertrips

The purpose of this document is to consult on Amendment Proposal CAP124 with CUSC Parties and other interested Industry members

Amendment Ref	CAP124
Issue	1.0
Date of Issue	23rd May 2005
Prepared by	National Grid

# I DOCUMENT CONTROL

# a National Grid Document Control

Version	Date	Author	Change Reference
1.0	24/05/2006	National Grid	Formal version for release

# **b** Document Location

National Grid website:

www.nationalgrid.com/uk/electricity/codes/

# c Distribution

Name	Organisation
CUSC Parties	Various
Panel Members	Various
Interested Parties	Various
Core Industry Document Owners	Various
National Grid Industry Information Website	-

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# 1.0 SUMMARY AND VIEWS

# **Executive Summary**

- 1.1 CAP124 Clarification of the withholding of payments for Operational Intertrips was proposed by National Grid and submitted to the Amendments Panel on 19<sup>th</sup> May 2006.
- 1.2 CAP076 introduced the System to Generator Operational Intertrip scheme into the CUSC. When the Intertrip is fired and the Generator is tripped off the system, National Grid may be required to pay the Generator an Intertrip Payment (Categories 2 and 4 only) and / or Restricted Export Level Payment.
- 1.3 Section 4.2A.5 highlights circumstance when National Grid is not obliged to make an Intertrip Payment or a Restricted Export Level Payment.
- 1.4 CAP124 aims to include an additional clause within section 4.2A.5 expanding upon the current provisions to clarify that a Restricted Export Level Payment or Intertrip Payment may be withheld should the Intertrip operate when a User has failed to disarm the System to Generator Operational Intertripping Scheme in accordance with an instruction from National Grid.

#### **National Grid's View**

1.5 National Grid, as the proposer of CAP124 is supportive of the Amendment Proposal, believing that it would better facilitate achievement of the Applicable CUSC Objective (a).

#### **Amendment Panels View**

1.6 The Amendments Panel agreed that CAP124 should proceed to wider consultation by National Grid for a period of 4 weeks.

# 1.0 PURPOSE AND INTRODUCTION

- 1.1 This is a consultation document issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State.
- 1.2 Further to the submission of Amendment Proposal CAP124, this document seeks views from industry members relating to the Amendment Proposal.
- 2.3 CAP124 was proposed by National Grid and submitted to the CUSC Amendments Panel for consideration at their meeting on 19<sup>th</sup> May 2006. The Amendments Panel determined that CAP124 was appropriate to proceed to wider industry consultation by National Grid.
- 2.4 This consultation document outlines the nature of the CUSC changes that are proposed. Representations received in response to this consultation document will be included in National Grid's Amendment Report that will be furnished to the Authority for their decision.
- 2.5 This consultation document has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at <a href="https://www.nationalgrid.com/uk/Electricity/Codes/">www.nationalgrid.com/uk/Electricity/Codes/</a> and the Amendment Proposal

- form. This document invites views upon CAP124 and the **closing date is 20th June 2006 at 5pm** for responses including any Consultation Alternatives.
- 2.6 CUSC Parties are reminded that any Consultation Alternatives must be submitted by the above closing date and must be in writing and contain sufficient detail in accordance with the requirements within CUSC 8.15.2

# 3.0 PROPOSED AMENDMENT

- 3.1 CAP124 proposes to amend CUSC 4.2A.5 to include an additional provision expanding upon the current provisions to clarify that a Restricted Export Level Payment or Intertrip Payment will be withheld should the Intertrip operate when a User has failed to disarm the System to Generator Operational Intertripping Scheme in accordance with an instruction from National Grid.
- 3.2 CAP076 introduced the System to Generator Operational Intertrip into the CUSC with 4 Categories of Intertrip. Categories 2 and 4 carry an Intertrip Payment when the Intertrip is fired. The Intertrip Payment fee aims to cover a number of costs, such as wear-and-tear arising from the trip, start-up fuel costs to bring to generator back
- In addition the Generator may also be paid a Restricted Export Level Payment; this is the payment provisions introduced by CAP048 Firm Access and Temporary Disconnection. Therefore, if the Generator is disconnected from the System for a period greater than 24 hours, a Restricted Export Level Payment may be made. This payment is a rebate of TNUoS based on actual or an average TNUoS fee across the country for the period of the disconnection.
- 3.4 The CUSC 4.2A.5 highlights circumstance when National Grid is not obliged to make an Intertrip Payment or a Restricted Export Level Payment.
- 3.5 At present there is a gap within CUSC 4.2A.5 in relation to withholding a payment when a Generator has failed to disarm in accordance with an instruction from National Grid. Therefore if a Generator has failed to disarm an Intertrip as instructed and National Grid's equipment sends an erroneous signal to the Circuit Breaker which then Intertrips, the Generator should not receive an Intertrip Payment or Restricted Export Level Payment, as the Intertrip should not have been armed.
- 3.6 The probability of this event occurring is small but the proposed amendment ensures the withholding payment provisions within the CUSC are complete and all foreseeable events are included within the CUSC.

# 4.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES

# **Proposed Amendment**

- 4.1 CAP124 would better facilitate CUSC Objective:
  - (a) The efficient discharge by the licensee of the obligations imposed upon it under the Act and by the Transmission Licence

4.2 It would do this by providing clarity for both National Grid and Generators in terms of when payments will or will not be withheld and ensuring all foreseeable events for the withholding of payments for Operational Intertrips are stated within the CUSC.

# 5.0 PROPOSED IMPLEMENTATION

5.1 National Grid proposes CAP124 should be Implemented 10 business days after an Authority decision. In accordance with 8.19.3(b) views are invited on this proposed implementation date.

# 6.0 IMPACT ON THE CUSC

6.1 CAP124 requires amendments to CUSC 4.2A.5 of Section 4 – Balancing Services. The text required to give effect to the Proposal is contained in Annex 1 of this document.

# 7.0 IMPACT ON INDUSTRY DOCUMENTS

7.1 CAP124 has no impact upon Core Industry Documents or Industry Computer Systems/Processes as it is a straightforward amendment to ensure all foreseeable events for withholding payments for Operational Intertrips are included with the CUSC.

# 8.0 INITIAL VIEW OF THE AMENDMENTS PANEL

- 8.1 The Amendments Panel agreed that CAP124 should proceed to wider consultation by National Grid, for a period of 4 weeks, subject to a minor correction of the proposed legal text, which amends a reference from 4.2A.2.2 (a) to 4.2A.2.1 (e) and the clarification of points raised by Panel Members. Each point shall be addressed in turn and views are specifically invited.
- 8.2 A Panel Member wished to confirm the situation when an Intertrip has not been disarmed and an erroneous signal is issued. National Grid confirms that Generators maybe paid an Intertrip Payment or Restricted Export Level Payment if the system is armed in accordance with an instruction from National Grid and National Grid's equipment sends an erroneous signal.
- 8.3 The same Panel Member was concerned regarding the timing of an instruction to disarm and any subsequent signal that was sent in error. In accordance with CUSC 4.2A.2.2 (d) a Generator must respond to an instruction from National Grid "as soon as reasonably practicable". The CUSC has no specific time limit for response as each Generators Intertripping scheme responds differently, therefore, if the signal was received shortly after an instruction to disarm which then Intertrips. The Generator may raise this issue with National Grid who shall endeavour to agree a mutually acceptable solution. If an agreement cannot be reached then Section 7 of the CUSC would provide the parties with a mechanism to resolve the issue.
- 8.4 A Panel Member was concerned regarding the process of arming and disarming and the demarcation line between National Grid and a Generator in terms of when National Grid may withhold either an Intertrip Payment or a Restricted Export Level Payment. National Grid confirms that CAP124 only applies when the User fails to disarm in accordance with an instruction from National Grid.

8.5 Finally, a Panel Member wished to confirm how National Grid would prove an Intertrip has been disarmed. As stated before each Generators Intertripping Scheme is different and will be disarmed in a different way which would be detailed with the Bilateral Agreement. However, any actions to arm or disarm are likely to be recorded within the Generators station log.

# 9.0 INITIAL VIEW OF NATIONAL GRID

- 9.1 National Grid believes CAP124 would ensure the withholding payment provisions for Operational Intertrips are complete and clear for both National Grid and Generators.
- 9.2 National Grid believes for the reasons stated above this would better achieve CUSC Applicable Objective (a).

# 10.0 VIEWS INVITED

- 10.1 National Grid is seeking the views of interested parties in relation to the issues raised by Amendment Proposal CAP124 and issues arising from the proposed timescale for implementation.
- 10.2 Please send your responses to this consultation to National Grid by no later than 5pm on **20th June 2006**.
- 10.3 Please address all comments to the following e-mail address:

Beverley.viney@uk.ngrid.com

Or alternatively, comments may be addressed to:

Beverley Viney
Amendments Panel Secretary
Electricity Codes
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

# ANNEX 1 - PROPOSED LEGAL TEXT TO MODIFY THE CUSC

The proposed Legal text to modify the CUSC is detailed below by inserting the coloured underlined text and deleting the text shown stuck through.

CUSC Section 4 – Balancing Services, 4.2A.5

# 4.2A.5 Withholding of payments

The Company shall not be obliged to make any Restricted Export Level Payment or Intertrip Payment pursuant to Paragraph 4.2A.4 where the tripping of BM Unit(s) or (where relevant) Generating Unit(s) comprised in a BM Unit occurs:-

- during any period where the **System to Generator Operational Intertripping Scheme** is not instructed by **The Company** to be armed in accordance with Paragraphs 4.2A.2.2(a) and 4.2A.2.2(d); and/or
- (b) where the **User** has failed to arm the **System to Generator Operational Intertripping Scheme** in accordance with the terms of Paragraph 4.2A.2.1(b); and/or
- (c) where the **User** has failed to disarm the **System to Generator Operational**Intertripping Scheme in accordance with the terms of Paragraph

  4.2A.2.1(e); and/or
- where the User has failed to exercise Good Industry Practice to restrict the export of Active Power from the Connection Site to the Restricted MW Export Level as required by Paragraph 4.2A.2.1(c) (ignoring any export above Restricted MW Export Level where pursuant to an instruction from The Company to provide any Balancing Service(s)); and/or
- <u>(d)(e)</u> where no signal is received by the **User**'s **Circuit Breaker**(s) from the **System to Generator Operational Intertripping Scheme**

# **ANNEX 2 – AMENDMENT PROPOSAL FORM**

#### CUSC Amendment Proposal Form

**CAP:124** 

Title of Amendment Proposal:

Clarification of the withholding of payments for Operational Intertrips

Description of the Proposed Amendment (mandatory by proposer):

It is proposed to change section 4.2A.5 to include an additional provision expanding upon the current clauses to clarify that a Restricted Export Level Payment or Intertrip Payment will be withheld should the Intertrip operate when a User has failed to disarm the System to Generator Operational Intertripping Scheme in accordance with an instruction from National Grid.

Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer):

CAP076 introduced four new categories of System to Generator Operational Intertrip into the CUSC. Categories 2 and 4 both carry a payment rate of £400,000 per Generating Unit per trip when the Intertrip is fired. The Intertrip Payment aims to cover a number of costs, such as wear-and-tear arising from the trip and start up fuel costs to bring the generator back onto the system.

The Generator may also be paid a Restricted Export Level Payment, identical to certain payment provisions introduced by CAP048 – Firm Access and Temporary Disconnection – if the Generator is disconnected from the system for a period greater than 24 hours. This payment is a rebate of TNUoS based on actual or an average TNUoS fee across the country for the period of the disconnection

The CUSC 4.2A.5 highlights circumstance when National Grid is not obliged to make an Intertrip Payment or a Restricted Export Level Payment.

However, there is a gap within the provision in relation to withholding a payment when a Generator has failed to disarm in accordance with an instruction from National Grid. Therefore if a Generator has failed to disarm an Intertrip as instructed and National Grid's equipment sends an erroneous signal to the Circuit Breaker which then Intertrips, the Generator should not receive an Intertrip Payment or Restricted Export Level Payment, as the Intertrip should not have been armed.

The probability of this event occurring is small but the proposed amendment ensures the withholding payment provisions within the CUSC are complete and cover all foreseeable events.

Impact on the CUSC (this should be given where possible):

CUSC Section 4 – Balancing Services, 4.2A.5 by the inserting the coloured underline text and deleting the coloured

#### 4.2A.5 Withholding of payments

The Company shall not be obliged to make any Restricted Export Level Payment or Intertrip Payment pursuant to Paragraph 4.2A.4 where the tripping of **BM Unit(s)** or (where relevant) **Generating Unit(s)** comprised in a **BM Unit** occurs:-

- (a) during any period where the **System to Generator Operational Intertripping Scheme** is not instructed by **The Company** to be armed in accordance with Paragraphs 4.2A.2.2(a) and 4.2A.2.2(d); and/or
- (b) where the **User** has failed to arm the **System to Generator Operational Intertripping Scheme** in accordance with the terms of Paragraph 4.2A.2.1(b); and/or
- (c) where the **User** has failed to disarm the **System to Generator Operational Intertripping Scheme** in accordance with the terms of Paragraph 4.2A.2.2(a); and/or
- where the User has failed to exercise Good Industry Practice to restrict the export of Active Power from the Connection Site to the Restricted MW Export Level as required by Paragraph 4.2A.2.1(c) (ignoring any export above Restricted MW Export Level where pursuant to an instruction from The Company to provide any Balancing Service(s)); and/or
- (d)(e) where no signal is received by the User's Circuit Breaker(s) from the System to Generator Operational Intertripping Scheme.

Impact on Core Industry Documentation (this should be given where possible):

None anticipated

Impact on Computer Systems and Processes used by CUSC Parties (this should be given where possible):

N/A

Details of any Related Modifications to Other Industry Codes (where known):

Justification for Proposed Amendment with Reference to Applicable CUSC Objectives\*\* (mandatory by proposer):

National Grid believes that this proposal will better facilitate CUSC Applicable Objective (a) (The efficient discharge by the licensee of the obligations imposed upon it under the Act and by the Transmission Licence) by providing clarity for both National Grid and Generators in terms of when payments will or will not be withheld and ensuring all foreseeable events for the withholding of payments for Operational Intertrips are stated within the CUSC.

Details of Proposer: Organisation's Name:	National Grid	
Capacity in which the Amendment is being proposed: (i.e. CUSC Party, BSC Party or "energywatch")	CUSC Party	
Details of Proposer's Representative: Name: Organisation: Telephone Number: Email Address:	Emma Carr National Grid 01926 655843 Emma.j.carr@uk.ngrid.com	
Details of Representative's Alternate: Name: Organisation: Telephone Number: Email Address:	Mark Duffield National Grid 01926 654971 mark.duffield@uk.ngrid.com	
Attachments (Yes/No):  If Yes, Title and No. of pages of each Attachment:  No		

- Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.
- The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.

The completed form should be returned to:

**Beverley Viney** Panel Secretary Commercial Frameworks National Grid National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DA

Or via e-mail to: <a href="mailto:beverley.viney@uk.ngrid.com">beverley.viney@uk.ngrid.com</a>

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

Applicable CUSC Objectives\*\* - These are defined within the National Grid Company Transmission Licence under Section C7F, paragraph 15. Reference should be made to this section when considering a proposed amendment.