Guidance Document

Managing the number of unit starts

Prepared by National Grid (Plc)

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Author RJP
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nationalgrid

NOTES

'This document provides guidance to BM Participants on how to manage the number of starts that their units are subject to in the absence of a two shifting limit parameter or similar factor. The guidance notes do not form part of the GC, and if there is any conflict between the Guidance Notes and the GC, or any other agreement, then that agreement shall take precedence'.

DOCUMENT CHANGE CONTROL DETAILS

ISSUE No.	PUBLISHED	CHANGES MADE	APPROVED	JOB TITLE
0.1	15 Mar 2013	Initial draft	RJP	
0.2	10 April 2013	Updated following bilateral discussions	RJP	
0.3	23 April 2013	Updated following discussions at the EBS Working Group	RJP	
0.4	30 April 2013	Updated following correspondence with EBSG members	RJP	
1.0	14 May 2013	First issue following circulation to the GCRP for review	RJP	
	10 Nov 2015	Transferred to common format – Content unchanged	TKT	

Contents

1. Purpose

This document provides guidance to BM Participants on how to manage the number of starts that their units are subject to in the absence of a two shifting limit parameter or similar factor.

This guidance document was originally produced as supporting information for the Grid Code amendment F/12 "Treatment of Two Shifting Limit". It supersedes all previous guidance issued by National Grid Electricity Transmission plc (NGET) on this subject and in particular the document entitled "Two Shifting Limit – Current Grid Code Status: July 2011".

2. Two Shifting Limit

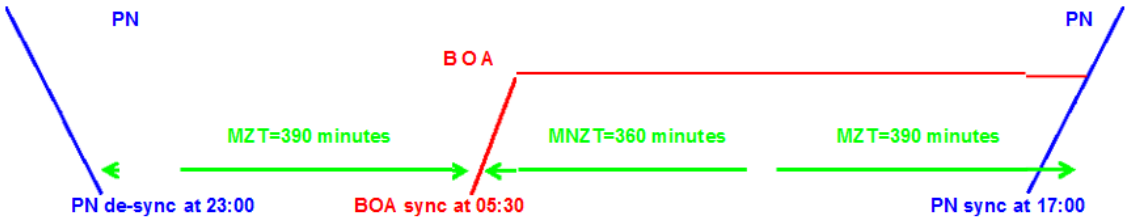
Two shifting limit has previously been defined as "The maximum number of times in any Operational Day that a Genset may De-Synchronise."

In the past, Two shifting limits have been submitted to NGET as Other Relevant Data under Grid Code BC1.4.2(f)(v) "...which NGET may take account of when issuing Bid-Offer Acceptances for a BM Unit..." Following the Authority's decision on Grid Code Amendment F/12, NGET's position is that it will not take account of any two shifting limits or similar factors submitted to it when issuing Bid-Offer Acceptances.

3. Guidance on managing the number of unit starts

If a BM Participant wishes to manage the number of starts that their unit is subject to, then NGET's advice is that BM Participants should use Dynamic Parameters including Minimum Zero Time (MZT) and/or Minimum Non-Zero Time (MNZT) and/or Bid-Offer Data Prices to achieve this. It is for the BM Participant to determine the combination of Dynamic Parameters and/or Bid-Offer Data Prices that best meets their requirements. This data will be used by NGET in accordance with the Grid Code for the preparation and analysis of its operational plans. As per Grid Code BC2.7.2(a) "Bid-Offer Acceptances will be consistent with...the Dynamic Parameters provided or modified under BC2".

An example of using the Dynamic Parameters of MZT and MNZT to manage the number of unit starts is shown below. The unit's Physical Notification (PN) reduces to zero at 23:00 where it stays for 18 hours until 17:00 when the PN increases from zero. The BM Participant is prepared for the unit to be brought on earlier than 17:00, providing that it is not de-synchronised prior to 17:00. Consequently, the values of MZT and MNZT allow NGET the option of issuing Bid-Offer Acceptances to advance the unit's PN synchronisation from 17:00 to as early as 05:30, without allowing them to de-Synchronise the unit prior to the PN synchronisation at 17:00. In order to achieve a result that meets their requirements, the BM Participant may revise their MZT and/or MNZT such that the sum of two times MZT plus MNZT is greater than the period for which the PN is zero.

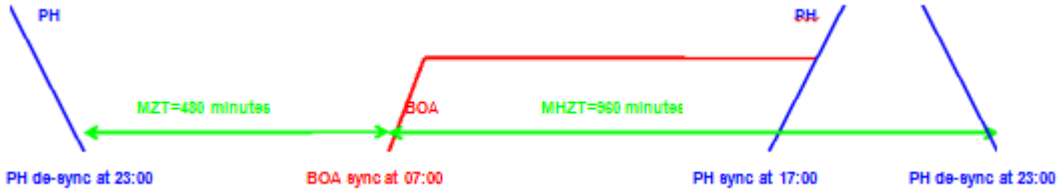


In the above example, there is the theoretical risk that NGET may issue Bid-Offer Acceptances to delay the PN synchronisation at 17:00, but in practice this is highly unlikely as:

- At this time of day, NGET regularly schedules more BM Units than the market provides, rather than fewer;
- In the event that Bids are required, there are substantial volumes of Bids available to de-load running BM Units that are significantly more economic than those to keep BM Units at zero.

BM Participants may wish to review their Bid prices for operation at zero to ensure that they meet their requirements.

If a BM Participant wishes to use Dynamic Parameters to completely avoid this situation, then they could set MNZT to, say, 960 minutes and MZT to, say, 480 minutes as illustrated in the diagram below. The main options this would present to NGET are to issue Bid-Offer Acceptance to synchronise the BM Unit at 07:00 hours and run it through to the end of its PN at 23:00 hours, or alternatively leave the BM Unit to run to its PN synchronisation time. By setting MNZT and MZT so that they sum to 24 hours as in this example, it also ensures that the BM unit can only start once in a day.



4. Data Errors or Omissions and their use in Bid-Offer Acceptances

NGET recognises the concerns of BM Participants regarding the workload associated with using Dynamic Parameters to manage the number of unit starts and the risks and consequences of any errors or omissions. In connection with this, NGET considers that the following Grid Code obligations on BM Participants and NGET may provide BM Participants with some comfort:

- Grid Code BC2.5.3.1 states that "The Dynamic Parameters...shall be prepared in accordance with Good Industry Practice". The Grid Code Glossary and Definitions defines Good Industry Practice as "The exercise of that degree of skill, diligence, prudence and foresight that would reasonably and ordinarily be expected from a skilled and experienced operator..." NGET's interpretation of this definition in this context, and in particular the word "reasonably", is that occasional errors or omissions may be expected in the Dynamic Parameters submitted by BM Participants to NGET.

- In terms of the consequences of any errors or omissions in the Dynamic Parameters submitted to NGET i.e. their use by NGET in constructing Bid-Offer Acceptances, then Grid Code BC2.7.3 requires NGET to use its "reasonable opinion" in determining whether to log a Bid-Offer Acceptance as confirmed that has previously been rejected by the BM Participant. Again, NGET's interpretation of "reasonable" in this context recognises that there may be occasional errors or omissions in the Dynamic Parameters submitted to NGET. In these circumstances, NGET considers that it would be unreasonable for it to confirm a rejected Bid-Offer Acceptance that had been based on these Dynamic Parameters.

Manifest errors in the submission of Bid-Offer Data Prices are covered by the provisions of section Q7 of the Balancing and Settlement Code.

5. Communication with BM Participants

NGET may contact a BM Participant to:

- Confirm that BM Unit Data submissions received by NGET were as the BM Participant intended.
- Seek to understand whether BM Unit Data submissions received by NGET are consistent with the provisions of the Grid Code.

6. Further Information

Please e-mail Grid.Code@nationalgrid.com if you would like further information on this subject.