

nationalgrid



AMENDMENT REPORT

SQSS Review Report GSR002

Housekeeping Amendment

*Prepared by the SQSS Review Group
for submission to the Authority*

| | |
|---------------|-----------------------------|
| Amendment Ref | GSR002 |
| Issue | 1.0 |
| Date of Issue | 21 st March 2011 |
| Prepared by | SQSS Review Group |

I DOCUMENT CONTROL

a SQSS Document Control

| Version | Date | Author | Change Reference |
|----------------|-------------|-------------------|---|
| 0.1 | 17/03/2009 | SQSS Review Group | Draft for SQSS Review Group |
| 1.0 | 21/03/2011 | SQSS Review Group | Final version agreed by SQSS Review Group |
| | | | |
| | | | |

b Document Location

National Grid Website:

<https://www.nationalgrid.com/uk/Electricity/Codes/gbsqsscode/reviews/>

c Distribution

| Name | Organisation |
|--|---------------------|
| The Gas and Electricity Markets Authority | Ofgem |
| SQSS Parties | Various |
| Interested Parties | Various |
| Core Industry Document Owners | Various |
| National Grid Industry Information Website | |

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1.0 SUMMARY AND RECOMMENDATION

- 1.1 SQSS Amendment Proposal GSR002 proposed the company name change from NGC to NGET, changes to the definition of the terms “small power station”, “medium power station” and “large power station” and the introduction of visible copyright statement on National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS).
- 1.2 Amendment Proposal GSR002 was proposed by National Grid Electricity Transmission plc and submitted for consideration to SQSS Review Group Meeting on 17th April 2007. The SQSS Review Group recommended that it proceed directly to the Consultation and Recommendation phase.

SQSS Review Group Provisional Recommendation

- 1.3 The SQSS Review Group recommends that GSR002 be approved for implementation.
- 1.4 It should be noted that this Change Request was raised prior to the Go-Active Date of the Offshore Regime (24th June 2009). The introduction of the Offshore Transmission regime had no material impact on the recommendations of this Report.

2.0 PURPOSE AND INTRODUCTION

- 2.1 The SQSS Review Group has the responsibility to maintain the NETS SQSS up-to-date. This consultation explores some minor modifications that need to be made to the NETS SQSS as a consequence of the following:
- Company name change from NGC to NGET;
 - Changes to the definition of the terms “small power station”, “medium power station” and “large power station” in the Grid Code; and
 - The need to copyright the NETS SQSS.
- 2.2 There are other proposed changes included in this amendment report although they were not specified in the housekeeping review request. These changes were considered to be of a housekeeping nature and were thus included on that basis. They mostly include modifications of other defined terms.
- 2.3 This Amendment Report has been prepared in accordance with the governance principles of the SQSS. An electronic copy of the governance principles and the SQSS Review Request Form for GSR002 may be accessed from the National Grid Website at:

<https://www.nationalgrid.com/uk/Electricity/Codes/gbsqsscode/reviews/>

3.0 THE PROPOSED AMENDMENT

3.1 *NGC to NGET*

The company name change from National Grid Company plc (NGC) to National Grid Electricity Transmission plc (NGET) was effected in 2005. No revisions have been made to the document which is reflective of this company name change.

3.2 *Defined term “NGC” to “NGET”*

The definition of NGET replaces that of NGC. NGET will be defined as “National Grid Electricity Transmission plc (2366977) whose registered office is 1 – 3 Strand, London WC2N 5EH”.

3.3 *England and Wales in “England and Wales area” to “NGET”*

The NETS SQSS refers to the transmission areas for the Scottish transmission licensees as “SPT area” and “SHETL area” but for “NGC”, it refers to the area as “England and Wales area”. Since “England and Wales” is used in this context to refer to the transmission area for NGET, it would be consistent to replace the term “England and Wales area” with “NGET area”. However, following Grid Code changes B/06 (13/07/06)¹ on the definition of small, medium and large power stations, the locations of the power stations are based on electrical connection to the transmission system rather than on geographic basis. It was recognised that it is possible to have a power station located in a geographical area served by one transmission licensee while electrically connected to another transmission licensee’s system. This can occur in areas around geographic boundaries of areas served by different transmission licensees. It is therefore proposed to adopt this approach in the NETS SQSS to ensure consistency with the Grid Code. The terms “NGET area” (currently cited as “England and Wales area”), “SPT area” and “SHETL area” would therefore be replaced with “NGET’s transmission system”, “SPT’s transmission system” and “SHETL’s transmission system” respectively. The new term “transmission system” would be as defined in Section 2.4.4.

3.4 *Definitions of power station sizes*

Although the NETS SQSS definitions of “small power station”, “medium power station” and “large power station” do not make specific reference to the corresponding Grid Code terms, they were broadly the same as those in the Grid Code at the time. Following the Grid Code changes to the definitions of small, medium and large power stations², it is proposed to align the corresponding NETS SQSS definitions since the Grid Code changes affect the amount of generation in the SHETL transmission system that have to be modelled explicitly in the NETS SQSS.

3.4.1 *Defined term “Small Power Station”*

It is proposed to change the definition of the term “Small Power Station” to:

“A power station which is:

1. *directly connected to*

a. *NGET’s transmission system where such power station has a registered capacity of less than 50MW; or*

¹ <http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/2006/>

² <http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/consultationpapers/2006/>

- b. SPT's transmission system where such power station has a registered capacity of less than 30MW; or*
- c. SHETL's transmission system where such power station has a registered capacity of less than 10MW;*

Or

- 2. embedded within a user system (or part thereof) where such user system (or part thereof) is connected under normal operating conditions to:*
 - a. NGET's transmission system where such power station has a registered capacity of less than 50MW; or*
 - b. SPT's transmission system where such power station has a registered capacity of less than 30MW; or*
 - c. SHETL's transmission system where such power station has a registered capacity of less than 10MW";*

Or

- 3. In offshore waters, a power station connected to an offshore transmission system with a registered capacity of less than 10MW.*

3.4.2 Defined term "Medium Power Station"

It is proposed to change the definition of the term "Medium Power Station" to:

"A power station which is:

- 1. directly connected to NGET's transmission system where such power station has a registered capacity of 50MW or more but less than 100MW;*

Or

- 2. embedded within a user system (or part thereof) where such user system (or part thereof) is connected under normal operating conditions to NGET's transmission system where such power station has a registered capacity of 50MW or more but less than 100MW;*

The medium power station category does not exist in SPT's transmission system and SHETL's transmission system".

3.4.3 Defined term "Large Power Station"

It is proposed to change the definition of the term "Large Power Station" to:

"A power station which is:

- 1. directly connected to:*
 - a. NGET's transmission system where such power station has a registered capacity of 100MW or more; or*
 - b. SPT's transmission system where such power station has a registered capacity of 30MW or more; or*
 - c. SHETL's transmission system where such power station has a registered capacity of 10MW or more;*

Or

- 2. embedded within a user system (or part thereof) where such user system (or part thereof) is connected under normal operating conditions to:*

- a. NGET's transmission system where such power station has a registered capacity of 100MW or more; or
- b. SPT's transmission system where such power station has a registered capacity of 30MW or more; or
- c. SHETL's transmission system where such power station has a registered capacity of 10MW or more;

Or

- 3. In offshore waters, a power station connected to an offshore transmission system with a registered capacity of 10MW or more."

Table 1 summarises the changes to the definitions of power station sizes. The main changes from the current definitions are that the medium power station category in the SPT and SHETL systems has been removed. This results in the increase of the upper threshold of small power stations in SPT system from 5MW to 30MW. For the SHETL system, the threshold increases from 5MW to 10MW. The lower thresholds for large generation have not changed except for the SHETL system where the threshold changed from 5MW to 10MW. The implication of this is that less generation in SHETL system will be modelled explicitly in the NETS SQSS application.

Table 1. Summary of changes to thresholds of power station sizes

| | Current definition | | | Proposed definition | | |
|--------------|--------------------|-------------------|---------|---------------------|-------------------|---------|
| | Small | Medium | Large | Small | Medium | Large |
| NGET | < 50MW | ≥ 50MW < 100MW | ≥ 100MW | < 50MW | ≥ 50MW < 100MW | ≥ 100MW |
| SPT | < 5MW | ≥ 5MW < 30MW | ≥ 30MW | < 30MW | – | ≥ 30MW |
| SHETL | < 5MW | < 5MW | ≥ 5MW | < 10MW | – | ≥ 10MW |

3.5 Defined term "Transmission system"

Following the definitions of small, medium and large power station on an electrical rather than geographic basis, the term "Transmission system" needs to be defined. The proposed definition of the term makes direct reference to the transmission licence as follows:

"Transmission system shall have the same meaning as the term "licensee's transmission system" in the Transmission licence of a Transmission licensee.

3.6 Modification of the term "ACS Peak Demand"

There may be a case for inserting the word 'unrestricted' (meaning that the demand is not adjusted to take into account demand management or other techniques that could modify the demand) in the definition given that it is the unrestricted demand which is mostly used when applying the criteria. In order to improve the clarity of the definition, it is proposed not to mention transmission and distribution losses as they are already implied in the definition. Their mentioning would necessitate also mentioning embedded small and medium generation which are not explicitly mentioned in the current definition. The proposed definition would read:

“ACS Peak Demand: The estimated unrestricted winter peak demand (MW and MVar) on the national electricity transmission system for the average cold spell (ACS) condition. This represents the demand to be met by large power stations (directly connected or embedded), medium power stations and small power stations which are directly connected to the national electricity transmission system and by electricity imported into the onshore transmission system from external systems across external interconnections (and which is not adjusted to take into account demand management or other techniques that could modify demand).”

3.7 Defined but not used term: “Adverse Conditions”

This term is not currently used in the standard following editing changes made when producing the current version of the GB SQSS. It is proposed Consultation Reference: GSR002 Page 9 of 14 to make a slight adjustment to Section 5.5.1 of the GB SQSS by reintroducing the term to read:

“5.5.1 There are adverse conditions such that the likelihood of a double circuit overhead line fault is significantly higher than normal; or”

Basically, the phrase “*conditions are adverse*” is being replaced with “*there are adverse conditions*”. There might have been an oversight of this issue during the drafting of the current NETS SQSS version.

3.8 Defined but not used term: “Cyclic Rating”

This term is not used in the text any more. It used to be in the definition of ‘thermal rating’ (also no longer used), which in turn was in the definition of ‘unacceptable overloading’, which was redrafted without reference to thermal rating. It is proposed to delete the term.

3.9 Modification of the term: “Generator”

This is to correct and align the definition of this term with the Grid Code definition. The proposed definition is an amendment of the current one to give the following definition:

“Generator: A person who generates electricity under licence or exemption under the Electricity Act 1989 as amended by the Utilises Act 2000 and the Energy Act 2004 as a generator in Great Britain or Offshore.”

3.10 Modification of the term: “Registered Capacity”

The Grid Code definition of ‘registered capacity’ is more up-to-date therefore it is proposed to use the same in the NETS SQSS. Essentially, the newer definition includes the power park module. The proposed definition is as follows:

“Registered Capacity:

- a) In the case of a generating unit other than that forming part of a CCGT module or power park module, the normal full load capacity of a generating unit as declared by the generator, less the MW consumed by the generating unit through the generating unit’s unit transformer when producing the same (the resultant figure being expressed in whole MW).*
- b) In the case of a CCGT module or offshore gas turbine or power park module, the normal full load capacity of the CCGT module or offshore gas turbine or power park module (as the case may be) as declared by the*

generator, being the active power declared by the generator as being deliverable by the CCGT module or offshore gas turbine or power park module at the GEP (or in the case of a CCGT module or offshore gas turbine or power park module embedded in a user system, at the user system entry point), expressed in whole MW.

- c) In the case of a power station, the maximum amount of active power deliverable by the power station at the GEP (or in the case of a power station embedded in a user system, at the user system entry point), as declared by the generator, expressed in whole MW. The maximum active power deliverable is the maximum amount deliverable simultaneously by the generating units and/or CCGT modules and/or offshore gas turbines and/or power park modules less the MW consumed by the generating units and/or CCGT modules and/or offshore gas turbines and/or power park modules in producing that active power.*
- d) In the case of a DC converter at a DC converter station, the normal full load amount of active power transferable from a DC converter at the GEP (or in the case of an embedded DC converter station at the user system entry point), as declared by the DC converter station owner, expressed in whole MW, or in MW to one decimal place.*
- e) In the case of a DC converter station, the maximum amount of active power transferable from a DC converter station at the GEP (or in the case of an embedded DC converter station at the user system entry point), as declared by the DC converter station owner, expressed in whole MW, or in MW to one decimal place.*

3.11 New defined term “Onshore Power Park Module”

Following use of the term in the proposed definition of ‘registered capacity’, the definition of power park module needs to be included under definitions as follows:

“A collection of non-synchronous generating units (registered as a power park module under the Planning Code in the Grid Code) that are powered by an intermittent power source, joined together by a system with a single point of electrical connection to the onshore transmission system (or user system if embedded). The connection to the onshore transmission system (or user system if embedded) may include a DC converter.”

3.12 Modified term “Onshore Power Station”

Following the introduction of the onshore power park module, the term ‘onshore power station’ needs to be modified accordingly:

“Power Station: An installation comprising one or more onshore generating units or onshore power park module (even where sited separately) owned and/or controlled by the same generator, which may reasonably be considered as being managed as one onshore power station.”

3.13 Copyrighting the NETS SQSS

Sub-paragraph 4.2.1.5 of the SQSS governance attaches a condition to the right to make a proposal to review the NETS SQSS. The salient points are that the proposer, by submitting a review proposal, (i) “grants a non-exclusive royalty-free licence to all parties who request the same covering all present and future rights, intellectual property rights and moral rights it may have in such request...” and (ii) “warrants that to the best of its knowledge, information and belief, no other person has asserted to the proposer that such person has any intellectual property rights or moral rights or rights of

confidence in such proposal inconsistent with the party's rights to make, publish or use such request." Against this background, it has been proposed to copyright the NETS SQSS. Currently, the NETS SQSS is jointly owned by the three onshore transmission licensees. The following wording for the copyright is being proposed:

On the front page:

© 2010 Copyright jointly owned by National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, all rights reserved.

No part of this publication may be reproduced in any material form (including photocopying and restoring in any medium or electronic means and whether or not transiently or incidentally) without the written permission of National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, except :

1. to the extent that any party who is required to comply (or is exempt from complying) with the provisions under the Electricity Act 1989 reasonably needs to reproduce this publication to undertake its licence or statutory duties within Great Britain or Offshore Waters (or any agent appointed so to act on that party's behalf); and

2. in accordance with the provisions of the Copyright, Designs and Patents Act 1988.

4.0 DEVELOPMENT PHASE

- 4.1 The SQSS Review Group considered that that GSR002 should be referred directly to the Consultation and Recommendation Phase.

5.0 TRANSMISSION LICENSEES ASSESSMENTS

- 5.1 This section sets out the analysis and impact assessment ("Assessment") provided by each Transmission Licensee.

National Grid Assessment

- 5.2 National Grid is supportive of Review Request GSR002, and has carried out an Assessment on the Proposed Amendment.
- 5.3 The implementation of GSR002 would not have any physical impact on National Grid's Transmission System. No additional works or monies would be required to implement the proposed change.

Scottish Hydro-Electric Transmission Limited ("SHETL") Assessment

- 5.4 SHETL is supportive of Review Request GSR002, and have completed an Assessment on the Proposed Amendment.
- 5.5 The implementation of GSR002 would not have any physical impact on SHETL System(s). No additional works or monies would be required to implement the proposed change.

Scottish Power Transmission Limited (“SPTL”) Assessment

- 5.6 SPT is supportive of Review Request GSR002, and have completed an Assessment on the Proposed Amendment.
- 5.7 The implementation of GSR002 would not have any physical impact on SPT System(s). No additional works or monies would be required to implement the proposed change.

6.0 IMPACT ON THE NETS SQSS

- 6.1 It is proposed to amend NETS SQSS v2.1 with the proposed text changes highlighted in section 3 of this Amendment Report to create a new version as NETS SQSS v2.2 (See Appendix 2)
- 6.2 As of 24th June 2009, the former GB SQSS was replaced by the NETS SQSS. Effectively, all the previous requirements of the GB SQSS are maintained as requirements for the onshore transmission systems, and new requirements are codified in new chapters 7 to 10 for offshore transmission systems. There is no material impact to the arguments of this report, following from this change of framework from GB SQSS to NETS SQSS.
- 6.3 GSR002 is likely to be interactive with GSR009 (Review of Required Boundary Transfer Capability with Significant Volumes of Intermittent Generation) in terms of the associated licence modification. Depending on the timing of any Ofgem determination, there is the potential for the two review requests to have the same or different effective dates. The review requests are not interactive in terms of the proposed changes to the NETS SQSS.

7.0 IMPACT ON CORE INDUSTRY DOCUMENTS

- 7.1 The Proposed Amendment would have no impact on Core Industry Documents or other industry documentation or require any changes to computer systems established under Core Industry Documents.

8.0 SQSS REVIEW GROUP VIEWS AND RECOMMENDATION

- 8.1 The SQSS Review Group believes that amendment of the NETS SQSS on the basis on GSR002, would better facilitate achievement of the following applicable SQSS Review Group principles:
 - 8.1.1 It would enable the efficient discharge by the Transmission Licensees of the obligations imposed upon them by their Transmission Licenses and the Act.
 - 8.1.2 It would assist in enabling licensees to develop, maintain and operate an efficient economical and coordinated system of electricity transmission.
- 8.2 It ensures an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System.

9.0 IMPLEMENTATION AND TIMESCALES

- 9.1 Should the Authority approve Amendment Proposal GSR002, it is recommended that the NETS SQSS be modified in line with the proposed timescale for associated licence change.

10.0 INDUSTRY VIEWS AND REPRESENTATIONS

- 10.1 Views were invited from industry parties upon the Proposed Amendment outlined in this Amendment Report.
- 10.2 The SQSS Review Group received five responses following the publication of the Proposed Amendment Report (version 1.0 of this document). All respondents were supportive of the proposal but had issues with the copyrighting. These responses, along with National Grid's replies are included as appendix 4.
- 10.2.1 Respondent GSR002-CR-01 (E-ON UK) was supportive of the proposed amendments but had had concerns regarding the wording of the copyright notice and joint ownership arrangements for the copyright.
- 10.2.2 Respondent GSR002-CR-02 (Magnox Electric Limited) was supportive of the proposed amendments but had concerns regarding the wording of the copyright notice and joint ownership arrangements for the copyright.
- 10.2.3 Respondent GSR002-CR-03 (RWE) was supportive of the proposed amendments but had concerns regarding the wording of the copyright notice and joint ownership arrangements for the copyright.
- 10.2.4 Respondent GSR002-CR-04 (SP Transmission & Distribution) was supportive of the proposed amendments.
- 10.2.5 Respondent GSR002-CR-05 (Toby Manning Limited) was supportive of the proposed amendments but had concerns regarding the wording of the copyright notice and the joint ownership arrangements for the copyright.
- 10.3 The wording for the copyright has been subsequently amended to address the concerns raised on the original text. The amended text will allow relevant industry parties to utilise the Standard whilst providing the necessary protection against any potential misuse. Following discussion amongst the onshore TOs, the proposal for a joint ownership agreement is no longer being made.

Appendix 1 – Amendment Proposal

GSR002

GB SQSS REVIEW REQUEST

DATE: 17/04/2007

| |
|--|
| 1. Title of Review request |
| Housekeeping issues: <ul style="list-style-type: none">– Replacing the term NGC with NGET in the GB SQSS– Decoupling the GB SQSS definition of "small, medium and large power stations" from that in the Grid Code.– Copyrighting the GB SQSS |
| 2. Name of Proposer <i>(include name of contact person)</i> |
| The Secretary of the GB SQSS Review Group on behalf of the 3 transmission licensees. |
| 3. Proposer Contact Details¹ |
| National Grid House, Technology Park, Warwick, CV 34 6DA Tel: 01926 656322 Fax: 01926 656521 Email: GBsqss.review@uk.ngrid.com |
| 4. Description of issue(s)/Defect(s) to be addressed by the proposal |
| <ol style="list-style-type: none">1. Following the company name change from NGC to NGET, the GB SQSS needs to be updated accordingly2. Following Grid code changes (B/06) which resulted in the definitions of 'small, medium and large power stations' being changed, the corresponding definitions may need to be aligned in the GB SQSS. Alternatively, the GB SQSS definitions for "small, medium and large power stations" should be decoupled from the Grid Code definitions. |
| 5. Description of the review request, its nature and purpose |
| This is an exercise update the GB SQSS in accordance with company name change and changes in the Grid Code. |
| 6. Impact on the GB SQSS¹ |
| 6 (a) Parts of the GB SQSS that require amendment to give effect to the proposal |
| Chapter 3. – Table 3.2. |
| Chapter 7. Terms and definitions. |

| |
|--|
| 6 (b) Parts of the GB SQSS that would otherwise be affected by the proposal |
| <p>Chapter 3. – Table 3.2 may need to be modified as the amount of generation falling in the in the embedded 'large power stations' category may change.</p> <p>Chapter 7. Terms and Definitions – Revision of the definition of the term “Large Power Station”.</p> |
| 6 (c) Nature and contents of amendments or effects |
| As in item 4 above. |
| 7. Justification of the proposal, giving the background thereof ⁱⁱⁱ |
| The GB SQSS should be kept up-to-date pursuant to the GB SQSS Review Group terms of reference. |
| 8. Potential impact of the proposal on other Industry Framework Documents ^{iv} |
| N/A |
| 9. Potential impact of proposal on relevant computer systems ^v |
| N/A |

Guidance notes

- (i) Please include address, contact telephone/fax number and optionally, a contact email address.
- (ii) Impact on the GB SQSS - Where possible, give an indication of those parts of the GB SQSS which, in the opinion of the Proposer, would be likely to require amendment in order to give effect to (or would otherwise be affected by) the proposal and an indication of the nature and contents of those amendments or effects (including, where relevant, any need for the establishment of new, or removal of existing GB SQSS criteria and methodologies).
- (iii) Justification - Please give reasons why you believe that the proposal would better facilitate achievement of the GB SQSS objectives as compared with the then current version of the GB SQSS, together with background information in support thereof. If more space is needed you can use additional sheets of paper which should be attached to this form.
- (iv) Industry Framework Documents include but not limited to The Grid Code, System Operator – Transmission Owner Code and the Connection and Use of System Code.
- (v) Where possible, please give an indication of the potential impact of the proposal on relevant computer systems and processes used by the Transmission Licensees.
- (vi) Incomplete forms will not be processed. The Proposer may be asked to clarify any information that is not clear. The Proposer's attention is drawn to clause 4.2.1.5 of the GB SQSS governance document – condition to the right to make a review request/proposal.

Appendix 2 – Proposed Text Changes

These are submitted separately.

Appendix 3 – Consultation Response to the Proposed Changes

The following Appendix contains copies of all representations received from Authorised Electricity Operators through the consultation period.

Original Responses to GSR002 Consultation

| No. | Company | File Number |
|-----|----------------------------------|--------------|
| 1 | E.ON UK | GSR002-CR-01 |
| 2 | Magnox Electric Limited | GSR002-CR-02 |
| 3 | RWE | GSR002-CR-03 |
| 4 | SP Transmission and Distribution | GSR002-CR-04 |
| 5 | Toby Manning Limited | GSR002-CR-05 |

National Grid Replies to Consultation Responses

| No. | Company | File Number |
|-----|----------------------------------|---------------|
| 1 | E.ON UK | GSR002-CRR-01 |
| 2 | Magnox Electric Limited | GSR002-CRR-02 |
| 3 | RWE | GSR002-CRR-03 |
| 4 | SP Transmission and Distribution | GSR002-CRR-04 |
| 5 | Toby Manning Limited | GSR002-CRR-05 |

| | |
|-----------|--------------|
| Reference | GSR002-CR-01 |
| Company | E.ON UK |



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CV4 8LG
eon-uk.com

Paul Jones
024 76 183 383

paul.jones@eon-uk.com

7 September, 2007

Dear Bless,

GB SQSS CONSULTATION DOCUMENT - Housekeeping Amendment

Thank you for the opportunity to respond to the above consultation. In general we agree with the changes proposed. We do have one small issue however with the proposal to include a comprehensive copyright clause into the standards.

We are uncertain why the transmission companies wish the SQSS to contain such significant copyright provisions, as it is essentially an industry code. In order to operate within the industry governance arrangements, it is often necessary for participants to quote parts of the codes when making representations, or when responding to consultations. Our concern is that the clause as proposed may prevent participants from quoting the SQSS for these purposes. We would therefore be interested in your views as to how this concern would be allayed should such a clause be implemented.

In all other respects, we are content with the changes proposed.

Yours sincerely

Paul Jones
Trading Arrangements

E.ON UK plc
Registered in
England and Wales
No 2366970
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG

| | |
|------------------|-------------------------|
| Reference | GSR002-CR-02 |
| Company | Magnox Electric Limited |

To:
Bless Kuri
National Grid Electricity Transmission plc National Grid House Warwick Technology Park
Gallows Hill Warwick
CV34 6DA

(By email)

Bless

GB SQSS CONSULTATION DOCUMENT
Housekeeping Amendment Consultation Ref GSR002

This email is the formal response of Magnox Electric Ltd to the above consultation document. Magnox Electric Ltd operates the Magnox Power Station sites on behalf of the Nuclear Decommissioning Authority. These sites include large and small power stations and some directly connected demand sites in England, Wales and Scotland.

The housekeeping amendments seem generally sensible to me, and I support them all except for my reservation described below concerning the copyright notice.

I am not sure why the document needs to be copyrighted, but I am disturbed by the requirement that

"No part of this publication may be reproduced in any material form
(including photocopying and restoring in any medium or electronic means
and whether or not transiently or incidentally) without the written
permission..."

Surely, any person or organisation who has an interest in the electricity supply industry in GB ought to be able to keep copies, print copies, distribute copies to employees etc, to the extent reasonably necessary to participate in the industry in an informed way. These persons or organisations would include current and future "Users" of the transmission system, and any companies or consultants who provide services to them, Ofgem and relevant government departments etc

I am not sure of the extent of the exemptions allowed by "except in accordance with the provisions of the Copyright, Designs and Patents Act 1988". If you can assure me that this would allow the use of the Standard as I have described in my previous paragraph, then I would be willing to accept the Copyright notice as written, If it does not, then the copyright notice should be rewritten to allow such use.

I hope my comments are helpful. They are not confidential

Regards

David Ward

Magnox Electric Ltd
Berkeley Centre
Berkeley
Gloucestershire, GL13 9PB
United Kingdom

| | |
|-----------|--------------|
| Reference | GSR002-CR-03 |
| Company | RWE |

RWE Trading



Mr/Ms B Kuri
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E-Mail john.norbury@RWE.com

11th September 2007

Dear Mr/Ms Kuri

GB SQSS CONSULTATION DOCUMENT – HOUSEKEEPING AMENDMENT

Thank you for the opportunity to comment on the above consultation paper. The following response is provided on behalf of the RWE group of companies.

Copyrighting the GB SQSS

RWE has previously raised its concerns with the copyrighting of documentation in relation to NGET's Local Joint Restoration Plans and we do not necessarily accept it is appropriate or helpful for NGET to claim ownership of the intellectual property rights of such industry documents. Whilst such copyright in relation to the SQSS may not be appropriate, the SQSS is produced by National Grid Electricity Transmission plc's as part of its regulated activities and should not in any way be considered to be an asset of "National Grid plc" as proposed. Regarding the deemed joint ownership of the SQSS by Scottish Power Limited and Southern Electric plc, it is not clear how or why these two organisations should now be considered as joint owners and, if such proposed right of ownership can be demonstrated, why it should not be the licensees SHETL and SHE.

Without prejudice to the above, the proposed condition that "No part of this publication may be reproduced in any material form (including photocopying and restoring in any medium or electronic means and whether or not transiently or incidentally) without the written permission of....." would seem to provide a recipe for frustrating the workings of the GB electricity industry. It would be helpful if NGET would clarify how it envisages the proposed copyright conditions would be fulfilled whilst allowing the workings of the electricity industry to continue to operate efficiently.

Definitions

Whilst the SQSS is a statement produced by NGET under the terms of its transmission licence, certain requirements of the SQSS are referenced in both the Grid Code and the CUSC. We would therefore suggest that, to avoid confusion and maintain consistency, definitions which appear in either the CUSC or the Grid Code (e.g. Medium Power Station) are referenced to that document and not separately defined in the SQSS.

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United Kingdom
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F +44(0)1793/89 25 25
I www.rwe.com

Registered No. BR 7373

VAT Registration No.
GB 524 921354

Advisory Board:
Harry Roels

Management:
Peter Terium (CEO)
Stefan Jüdisch
Dr Peter Kreuzberg

Head Office:
Essen, Germany
Registered at:
Local District Court, Essen
Registered No.
HR 8 14327

Application of the SQSS

We have recently become aware that the SQSS Clause 2.6.4 creates a technical requirement on Generator owned circuits which are neither owned or operated by NGET and do not form part of the GB transmission system. Given that the SQSS does not directly apply to Generators, this would seem to be extending the SQSS to an area over which it has no jurisdiction. We therefore suggest that, as part of this "housekeeping consultation", this particular requirement of SQSS 2.6.4 be deleted and consideration given to possibly incorporating this particular requirement in the Grid Code Connection Conditions.

GB SQSS Review Group – Generator and other User representation

We note that the GB SQSS Review Group does not currently include a Generator or other User representative. Given the increasing impact of the GBSQSS requirements on Generators and other Users via the Grid Code (and to a lesser extent the CUSC) we believe that Users should have the opportunity to contribute to the development of GBSQSS prior to the public consultation stage. Our initial suggestion would be that any proposed changes to the GBSQSS are circulated to GCRP members for comment prior to public consultation.

I trust you will find the above comments helpful. If you wish to discuss this response please do not hesitate to contact me.

Yours sincerely

By email

John Norbury
Network Connections Manager

| | |
|-----------|----------------------------------|
| Reference | GSR002-CR-04 |
| Company | SP Transmission and Distribution |



SP Transmission & Distribution

Bless Kuri
National Grid Electricity Transmission plc
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Your ref

Our ref

Date
31st August 2007

Contact/Extension

Graeme Vincent
01698 413504

Dear Bless,

GSR002 – GB SQSS Consultation Document - Housekeeping Amendments

I am responding on behalf of SP Transmission and Distribution to the recent GB SQSS consultation. SP Transmission & Distribution is the licence holder for SP Transmission Limited, SP Distribution Limited and SP Manweb plc.

ScottishPower welcomes the opportunity to comment on the above consultation and have been actively involved in the wider review of the GB SQSS following the introduction of the governance arrangements earlier this year. We note that the proposed changes are mainly of housekeeping in nature and update the SQSS to reflect changes in other industry codes and therefore we support the changes being proposed.

If you have any queries in relation to this letter please do not hesitate to contact me.

Yours sincerely,

Graeme Vincent
Senior Engineering Consultant

Members of the ScottishPower group

New Alderston House, Dove Wynd, Strathclyde Business Park, Bellshill ML4 3FF
Telephone 01698 413000 Fax 01698 413053

SP Transmission Ltd Registered Office: 1 Atlantic Quay, Glasgow G2 8SP
Registered in Scotland No. 189126 Nat No. GB 619 3121 08

SP Manweb plc Registered Office: 5 Preston Way, Preston DN6 3ET
Registered in England and Wales No. 2306077 Vat No. GB 659 3120 08

SP Distribution Ltd Registered Office: 1 Atlantic Quay, Glasgow G2 8SP
Registered in Scotland No. 189125 Nat No. GB 659 3120 08

10/03

| | |
|------------------|----------------------|
| Reference | GSR002-CR-05 |
| Company | Toby Manning Limited |

Bless:

A first comment on the proposals: the copyright issue would require the permission of NGET, SPT **AND** SHETL before the document could be reproduced. At the very least this should be "NGET, SPT **OR** SHETL". Indeed, as written, would NGET require the permission of SPT and SHETL before it reproduced it itself??

Toby

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26 Groby Lane
Newtown Linford
LE6 0HH
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0870 1126827 (fax)

| | |
|-----------|---------------|
| Reference | GSR002-CRR-01 |
| Company | E-ON UK |



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CV34 6DA

Mr Paul Jones
Trading Arrangements
E.ON UK plc
Westwood Way
Westwood Business Park
Coventry CV4 8LG

Andrew Hioms
GBsqss.Review@uk.ngrid.com
Direct tel 01926 655421
www.nationalgrid.com

12 October 2007

Dear Paul,

GB SQSS CONSULTATION DOCUMENT – Housekeeping Amendment (GSR002)

I acknowledge receipt and thank you for your response to the GB SQSS housekeeping consultation dated 7 September 2007. I am pleased to note that you are in support of most of the proposed changes. In response to your concerns on the wording of the copyright notice, the following reworded copyright notice was proposed:

"© 2007 Copyright jointly owned by National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, all rights reserved.

No part of this publication may be reproduced in any material form (including photocopying and restoring in any medium or electronic means and whether or not transiently or incidentally) without the written permission of National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, except:

- 1. to the extent that any company licensed or exempt from a licence pursuant to the Electricity Act 1989 reasonably needs to reproduce this publication to undertake its licence or statutory duties within the UK; and*
- 2. in accordance with the provisions of the Copyright, Designs and Patents Act 1988".*

I believe the revised copyright notice addresses your concerns, however, should you need further information please do not hesitate to contact me.

Yours sincerely

By email

Andrew Hioms
Chairman, GB SQSS Review Group

| | |
|-----------|-------------------------|
| Reference | GSR002-CRR-02 |
| Company | Magnox Electric Limited |



National Grid House
Warwick Technology Park
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CV34 6DA

Mr David Ward
Magnox Electric Limited
Berkeley Centre
Berkeley
Gloucestershire
GL13 9PB

Andrew Hioms
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12 October 2007

Dear David,

GB SQSS CONSULTATION DOCUMENT – Housekeeping Amendment (GSR002)

I acknowledge receipt and thank you for your response to the GB SQSS housekeeping consultation by email dated 10 August 2007. I am pleased to note that you are in support of most of the proposed changes. In response to your concerns on the wording of the copyright notice, the following reworded copyright notice was proposed:

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- 2. in accordance with the provisions of the Copyright, Designs and Patents Act 1988".*

I believe the revised copyright notice addresses your concerns, however, should you need further information please do not hesitate to contact me.

Yours sincerely

By email

Andrew Hioms
Chairman, GB SQSS Review Group

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Registered in England and Wales, No 4031152

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|-----------|---------------|
| Reference | GSR002-CRR-03 |
| Company | RWE |



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Mr John Norbury
Network Connections Manager
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Andrew Hiorns
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12 October 2007

Dear John,

GB SQSS CONSULTATION DOCUMENT – Housekeeping Amendment (GSR002)

I acknowledge receipt and thank you for your response to the GB SQSS housekeeping consultation dated 11 September 2007. I would like to draw to your attention the fact that the GB SQSS is now jointly owned by the transmission licensees and not just National Grid. GB SQSS amendment proposals are made by the GB SQSS Review Group, to which all the transmission licensees are party to. It is from this perspective that the joint copyright ownership has been proposed.

I do recognise however that a joint ownership agreement will need to be drawn between the transmission licensees in order to address issues such as whether a third party would need permission from any one or all of the transmission licensees to make a copy of the GB SQSS or if any transmission licensee will need the permission of the other transmission licensees to make copies of the GB SQSS. This will be dealt with in due course. Meanwhile, the GB SQSS Review Group can coordinate requests to make copies to the GB SQSS until the joint ownership arrangements are established.

While still on the copyright issue, I would like to bring to your attention the revised proposed copyright notice that further clarifies the exceptional circumstances under which copies of the GB SQSS can be made. The proposed copyright notice now reads as follows:

"© 2007 Copyright jointly owned by National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, all rights reserved.

No part of this publication may be reproduced in any material form (including photocopying and restoring in any medium or electronic means and whether or not transiently or incidentally) without the written permission of National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, except:

- 1. to the extent that any company licensed or exempt from a licence pursuant to the Electricity Act 1989 reasonably needs to reproduce this publication to undertake its licence or statutory duties within the UK; and*
- 2. in accordance with the provisions of the Copyright, Designs and Patents Act 1988".*

Concerning definitions, a conscious decision was taken not to reference the Grid Code and CUSC for definitions that already exist as this could result in unintended consequences to the security standards due to changes in other codes. It is quite possible that these changes may have different drivers, hence they do not necessarily have to be exactly the same. Also the GB SQSS should be self contained as far as reasonably practicable - it is a technical document used by the planner in day-to-day activities, therefore there is no need for lengthy and winding legal definitions (The GB SQSS governance arrangements were developed as a stand alone document for this reason).

On the application of the SQSS, you mention that GB SQSS clause 2.6.4 creates technical requirements on generator owned circuits which are neither owned nor operated by NGET (I suppose you mean 'not owned by a transmission licensee and not operated by the system operator') and do not form part of the GB transmission system. I do not agree that deleting this clause (and possibly clause 2.6.3 too) can be classified as a housekeeping amendment as generation connection design variation can clearly impact on the security of the main interconnected transmission system. A full

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review would therefore be required to assess this impact before deleting the clause. Therefore, whether or not you are proposing to have this clause incorporated into the Grid Code, a formal review request would need to be submitted in accordance with the GB SQSS governance arrangements. The procedure for requesting a GB SQSS review is available on the GB SQSS website.

Finally, on Generator and other User representation on the GB SQSS Review Group, I wish to point out that this is not a GB SQSS housekeeping issue. Nevertheless, GCRP members can comment on the pre-consultation documents if they are party to the GB SQSS review group which at the moment they are not. Governance arrangements for the GB SQSS will be reviewed for offshore once the offshore framework is established (hopefully soon) and the issue of user representation can be raised at that stage.

I trust this addresses your concerns, however should you wish to discuss this further, please do not hesitate to contact me.

Yours sincerely

By email

Andrew Hiorns
Chairman, GB SQSS Review Group

| | |
|------------------|----------------------------------|
| Reference | GSR002-CRR-04 |
| Company | SP Transmission and Distribution |



National Grid House
Warwick Technology Park
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Mr Graeme Vincent
Senior Engineering Consultant
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12 October 2007

Dear Graeme,

GB SQSS CONSULTATION DOCUMENT – Housekeeping Amendment (GSR002)

I acknowledge receipt and thank you for your response to the GB SQSS housekeeping consultation dated 31 August 2007. I am pleased to note that you are in support of the proposed changes. You may be interested to know that there were two issues that came up from other responses, namely the wording of the copyright notice and joint ownership arrangements for the copyright.

Some respondents felt that the wording of the copyright notice may prevent legitimate users of the document from printing and distributing copies to employees, quoting parts of the GB SQSS in presentations, etc. In order to allay this concern, it was proposed to reword the copyright notice as follows:

"© 2007 Copyright jointly owned by National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, all rights reserved.

No part of this publication may be reproduced in any material form (including photocopying and restoring in any medium or electronic means and whether or not transiently or incidentally) without the written permission of National Grid Electricity Transmission plc, SP Transmission Limited and Scottish Hydro Electric Transmission Limited, except :

- 1. to the extent that any company licensed or exempt from a licence pursuant to the Electricity Act 1989 reasonably needs to reproduce this publication to undertake its licence or statutory duties within the UK; and*
- 2. in accordance with the provisions of the Copyright, Designs and Patents Act 1988".*

Concerning joint copyright ownership, a joint ownership agreement will need to be drawn between the transmission licensees to address issues such as whether a third party would need permission from any one or all of the transmission licensees to make a copy of the GB SQSS. This will be dealt with in due course. Meanwhile, the GB SQSS Review Group can coordinate requests to make copies to the GB SQSS until the joint ownership arrangements are established.

Should you have questions regarding this letter please feel free to contact me.

Yours sincerely

By email

Andrew Hioms
Chairman, GB SQSS Review Group

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| Reference | GSR002-CRR-05 |
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National Grid House
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Mr Toby Manning
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26 Groby Lane
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12 October 2007

Dear Toby,

GB SQSS CONSULTATION DOCUMENT – Housekeeping Amendment (GSR002)

I acknowledge receipt and thank you for your response to the GB SQSS housekeeping consultation by email dated 21 August 2007. I would like to draw to your attention the fact that the GB SQSS is now jointly owned by the transmission licensees and not just National Grid. GB SQSS amendment proposals are made by the GB SQSS Review Group, to which all the transmission licensees are party to. It is from this perspective that the joint copyright ownership has been proposed.

I do recognise however that a joint ownership agreement will need to be drawn between the transmission licensees in order to address issues such as whether a third party would need permission from any one or all of the transmission licensees to make a copy of the GB SQSS or if any transmission licensee will need the permission of the other transmission licensees to make copies of the GB SQSS. This will be dealt with in due course. Meanwhile, the GB SQSS Review Group can coordinate requests to make copies to the GB SQSS until the joint ownership arrangements are established.

While still on the copyright issue, I would like to bring to your attention the revised proposed copyright notice that further clarifies the exceptional circumstances under which copies of the GB SQSS can be made. The proposed copyright notice now reads as follows:

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- 2. in accordance with the provisions of the Copyright, Designs and Patents Act 1988".*

I trust this addresses your concerns, however, should you need further information please do not hesitate to contact me.

Yours sincerely

By email

Andrew Hiorns
Chairman, GB SQSS Review Group

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