

ENERGY TECHNICAL & RENEWABLE SERVICES LTD

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Future Electricity Networks Team
Department of Energy and Climate Change
Area D, 4th Floor
3 Whitehall Place
London
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Dear Sir/Madam

Improving Grid Access – Technical consultation on the proposed model

Thank you for the opportunity to respond to this consultation. This response is made on behalf of Energy Technical & Renewable Services Ltd, a specialist consultancy providing services to companies including developers in the on-shore and off-shore power generation sector.

Our comments are restricted to a response on the definition of “enabling works” which we found rather difficult to follow and missing some important elements.

As we understand it, at the highest level Enabling Works means whatever works designated as such in the generator’s Construction Agreement. The text of the CUSC then provides guidance on what ought to be included, namely:

Maximum Enabling Works (meaning Transmission Reinforcement Works (inclusive of substation works) that are required from the Connection Site to connect to a MITS Substation, where a MITS Substation means a Transmission substation with more than 4 Main System Circuits connecting at that substation);

and

the minimum requirement as set out in CUSC Section 13.2.4.1 to 13.2.4.7 (also defined as “Connect and Manage Derogation Criteria”).

However, it is clear from CUSC Section 13.2.5.2 that if the Connect and Manage Derogation Criteria are not satisfied simply by connecting to (or reinforcing the connection to) a MITS substation, then the Enabling Works will be in excess of the Maximum Enabling Works.

Therefore we think it would be clearer to change the term “Maximum Enabling Works” to “MITS Connection Works”. It should also be made clear that where this is exceeded, the works should only be the minimum needed to meet the Connect and Manage Derogation Criteria.

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Additionally, within such criteria, there may be situations where a site specific derogation is required, and if granted, this should not prevent the offer being classed as connect and manage.

Finally, we note the conditions in proposed CUSC clause 13.2.4.7 that the Transmission Owner would need to “avoid any adverse impact on other Users”. It is however clear from the Consultation that there will be impacts on other Users, although Government has decided that the proposals should proceed in any case. Therefore we think this should be qualified by the making it clear that any impact would have to be contemplated by the implementation of Connect and Manage.

In the attached annex we set out suggested changes to the CUSC drafting to implement the above proposals.

Yours sincerely

A R Cotton
Director

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Annex

Proposed changes to CUSC Definitions and Section 13 (Changes marked from Consultation Document)

"~~MITS Connection~~ ~~Maximum Enabling Works~~"

means those **Transmission Reinforcement Works** (inclusive of substation works) that are required from the **Connection Site** to connect to a **MITS Substation** (and in the context of an **Embedded Power Station**, "connection site" shall mean the associated **Grid Supply Point** identified as such in the relevant **Bilateral Agreement**);

Note: change all further references to "MITS Connection Works" to "Maximum Enabling Works", same in the STC

13.1 INTRODUCTION

- 13.1. This Section 13 deals with the identification and assessment of the **Enabling Works** to be included in an **Offer** made under the **Connect and Manage Arrangements**.

13.2 ENABLING WORKS

- 13.2.1 In making an **Offer**, the **Construction Works** (if any) which are required to be completed prior to connection and/or use of system are identified and set out in a **Construction Agreement**. Under the **Connect and Manage Arrangements** the **Construction Agreement** will identify which:

- (a) in the case of an **Onshore Connection Site** or **Onshore** site of connection, of the **Transmission Reinforcement Works**; and
- (b) and which, in the case of an **Offshore Connection Site**, of the **Offshore Transmission Reinforcement Works**

are the **Enabling Works** relevant to that **Applicant**.

- 13.2.2 Subject to Paragraph 13.2.5, the **Enabling Works** shall be no greater than the **MITS Connection ~~Maximum Enabling Works~~**. ~~The **Enabling Works** shall not be less than those unless and to the extent that additional works are~~ required to satisfy the criteria set out in Paragraph 13.2.4.

- 13.2.3 ~~The **Maximum Enabling Works** and the **Connect and Manage Derogation Criteria** shall be used to identify the extent and nature of the **Enabling Works** required in each offer of a **Construction Agreement**. Where the **Enabling Works** in any case are such that connection and/or use of system on completion of such works but in advance of any identified **Wider Reinforcement Works** does not comply with the requirements of the **NETS SQSS** a **Connect and Manage Self- Derogation** will be required.~~

- 13.2.4 The **Enabling Works** will ~~include the as a minimum include these~~ **Transmission Reinforcement Works** or **Onshore Transmission Reinforcement Works** required to:

- 13.2.4.1 achieve compliance with the "Pre-fault Criteria" set out in Chapter 2 (Generation Connection Criteria Applicable to the Onshore Transmission System) of the **NETS SQSS** (save to the extent that they are the subject of a derogation from the NETS SQSS);
- 13.2.4.2 achieve compliance with the "Limits to Loss of Power Infeed Risks" set out in Chapter 2 (Generation Connection Criteria Applicable to the Onshore Transmission System) of the **NETS SQSS** (save to the extent that they are the subject of a derogation from the NETS SQSS);
- 13.2.4.3 enable **The Company** to operate the **National Electricity Transmission System** in a safe manner;
- 13.2.4.4 resolve any fault level issues associated with the connection and/or use of system by the **Connect and Manage Power Station**;

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- 13.2.4.5 comply with the minimum technical, design and operational criteria and performance requirements under the **Grid Code** (save to the extent that they are the subject of a Derogation);
- 13.2.4.6 meet other statutory obligations including but not limited to obligations under any **Nuclear Site Licence Provisions Agreement**; and
- 13.2.4.7 avoid any adverse impact on other **Users** (beyond that contemplated by the implementation of the **Connect and Manage Arrangements**).
- 13.2.5 The **Enabling Works** set out in a **Construction Agreement** can be greater than the **MITS Connection Maximum Enabling Works** and the works needed to meet the criteria set out in Paragraph 13.2.4 where and to the extent that:
- 13.2.5.1 the **Applicant** has requested that this be the case (in its application or otherwise);
- 13.2.5.2 ~~The Company and/or the Relevant Transmission Licensee~~ consider it necessary in order to satisfy the criteria set out in Paragraph 13.2.4;
- ~~13.2.5.3~~ where **The Company** and the **User** agree.
- 13.3 MITS MAP**
- The Company** will include within the **Seven Year Statement** a map of the **National Electricity Transmission System** identifying the relevant **MITS Substations** for the purposes of the **MITS Connection Maximum Enabling Works**.
- 13.4 REPORT**
- On or before the end of each **Financial Year** **The Company** shall publish a report showing:
- (a) by reference to the number of **Offers** made under the **Connect and Manage Arrangements** during that **Financial Year**, the percentage of **Offers** where the **Enabling Works** were above the **MITS Connection Maximum Enabling Works** and the percentage of **Offers** where the **Enabling Works** were below the **MITS Connection Maximum Enabling Works**; and
- (b) by reference to each **Construction Agreement** where the **Enabling Works** were completed during that **Financial Year**, the period of time that it took to complete those **Enabling Works** and the transmission owner that undertook them.

END OF SECTION 13