

Electricity North West

304 Bridgewater Place, Birchwood Park,
Warrington, Cheshire WA3 6XG

Telephone: +44 (0) 1925 846999

Fax: +44 (0) 1925 846991

Email: enquiries@enwl.co.uk

Web: www.enwl.co.uk

Mrs Fay Geitona
CEER

Direct line 01925 864951

mkay@iee.org

19 September 2010

Dear Mrs Geitona

Pilot Framework Guidelines on Electricity Grid Connection

We are the distribution network operator (DNO or DSO) for the North West of England. We have no interests in the supply or generation of electricity; we are a wires-only business.

In general we see the proposals as logical and a necessary step forward. However we are concerned that the top-down approach will lead to inappropriate technical requirements being forced upon DNOs. We recognize that stable operation of the total system needs an appropriate hierarchy. It is important that this is developed in an appropriately engaged way so that the needs of TSOs and DNOs are appropriately balanced. We can see little issue with the proposals in the framework, however great care will be needed in the development and drafting such that the framework does not impose significant new costs without being completely clear of the need and benefit.

In response to your detailed questions:

1. We are not aware of any.
2. This is hard to answer without the detailed requirements being known. We believe that some aspects of the code could require a significant time to introduce fully – say up to five years – and that others can only be introduced as significant capital expenditure is made either on the network itself or on customers' capital equipment (eg generating plant). Clearly some requirements will be able to be implemented immediately.
3. From a technical point of view, it is only the synchronous area that matters. The timescale for harmonization across the EU is a political question.
4. Yes. However any requirement that drives significant cost must be subject to a detailed cost benefit analysis if it is intended to be implemented immediately. Otherwise such changes can be introduced when material alterations to the relevant plant or equipment are undertaken, irrespective of ownership. This is the principle that already applies in GB at both transmission and distribution level.

Cost should lie where they fall.

5. Yes. The GB arrangements already make these distinctions, albeit implicitly in some cases. We recognize that the changing pattern of demand and generation means that more development of codes for such usage is required.
6. We are not sure what the comparator is in relation to the question "more specific". Clearly we would expect there to be specific criteria for compliance, for verification and for enforcement. We are wondering if "reinforcement" is a typographical error in the question. We see questions of reinforcement relating to security standards, or to economics; codification of reinforcement needs is a second stage issue and not one we would expect to be in a technical code.
7. The key benefits are those deriving from an efficient and co-ordinated system. Co-ordination is key, and the code should ensure it is achieved most efficiently.
8. By simple thresholds specific to the synchronous area. The thresholds might be different for demand and generation, but they must be certain and enforced.
9. It is not immediately clear that it is essential to further improve this, at least in GB. The interactions have been defined and refined in the Grid and Distribution Codes for 20 years. Any change to these arrangements will need to be cost justified.

I hope these comments are useful. Please do not hesitate to contact me if you would like any point elaborating.

Yours sincerely,

Mike Kay
Network Strategy Director

by e-mail.

cc Energy Networks Association