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Annex ETQ 3 NAP Stakeholder Engagement

Scottish Hydro Electric Transmission plc

1 September 2020

Single GB NAP Presentation by SHE Transmission

Via Skype

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Thursday 26th Mar 2020

On telecon:

EdF: Ruth Kemsley (RK)
SSE Generation: Kevin Blundell (KB)
SHEPD: Deirdre MacDuff (DM)
Wood: John Smith (JM) - St Fergus Mobil
National Grid Gas: Brian Bonner (BB)
SHE-T: Alan Inman (AI)

FEEDBACK ON KPIS

KB - Please to see certain KPIs such as the measure of outages starting within 60mins of agreed start time (where attributable to TO).
AI - KPIs such as this one have been chosen based on customer feedback

KB - Keen to see an "actual output lost" due to outages KPI.
RK - Grid Code changed so that Available Power is a signal that generators must provide to the ESO. This could be used to aid the production of the above KPI.
AI - Noted request and would discuss possibility with ESO as it is the ESO who receive this signal and would therefore need to produce the KPI.

KB - Positive actions taken by TO / ESO to reduce the impact of an outage on generators are not being captured in KPIs. i.e. an outage could be delayed by 3 days affecting the outage accuracy KPI but the positive impact won't be properly reflected in the KPI measuring MW'HRs of curtailment.
AI - Will take back to work group to discuss how positive actions can be captured.

DM - Seeked clarification on Number of Faults v Number of Planned Outages
AI - Clarified that number of faults due to asset failure is intended to highlight TOs not delivering against the NAP priority of ensuring a Safe and Reliable System. Lightning strikes / faults due to outside influences would be captured in unplanned outages.

DM - Queried reduction in priority given to planned maintenance work in Current Year in draft Single GB NAP.
AI - Agreed this was incorrect in the draft Single GB NAP and AI has already contacted other GB TOs to ensure this is corrected before submission to Ofgem in June 2020.

DM / BB - Both customers would like to see a KPI measuring how often their site / GSPs were being put at risk.
AI - Understood as even if the KPI measuring the number of assets out of service more than once per annum was zero, there could be multiple assets out of service in one year which put the same GSP / site at risk

RK - Should Outage Duration accuracy KPI have a target of approx 90%? 90% suggest good accuracy if most outages have approx 10% contingency built in.
AI - Explained that most outages have an element of contingency within them to prevent one outage overrun to have multiple knock on effects. The amount of contingency can vary by work content, geography and location. Will still put proposal forward to workgroup as a yardstick proposal.

KB - Clarification on number of outage changes within 4 weeks of start date?
AI - This is meant to be a measure of TOs efforts in reducing missed outage requirements such as commissioning or access outages.

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General Comments

AI - Would take back to Single GB NAP workgroup that a further feedback session with Stakeholders would be worthwhile to give feedback on suggestions before final submission to Ofgem on June 30th 2020

AI - Asked for thoughts on how long would be required for customers to consider any TO proposals to reduce future outage impact? i.e. if an outage in 3yrs time were to constrain a generator for 5 months but the TO offered an option to reduce this to 1 month which the User would need to self-fund, how long would the User require to assess, make a decision and raise funding to agree the change with the TO?
KB - Suggested at least 2-3 months for SSE Generation but it would depend on the scale.
AI - Hopeful that discussions for such options should now take place years in advance rather than months, alleviating any risk of opportunities being missed due to time constraints.

DM / BB - Discussion point on another regulated business (such as National Grid Gas) spending consumer funding to reduce risk resulting from outages.
AI - Will take back to workgroup for discussion as this is a valid question that hadn't been raised before.

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Monday 31st Mar 2020

On telecon:

Fred Olsen: Graham Pannell (GP)
Qmulus: Ian Nicoll (IN) - multiple customers
Wood: Tom Gilchrist (TG)
SHE-T: Alan Inman (AI)

FEEDBACK ON KPIS

General Comments

GP - Comment that aiming to place all works in the summer won't necessarily suit all customers in the future and is something to discuss, particularly with solar customers. Acknowledged that with existing SHE Transmission customers, its likely summer would be best.

IN - Commented on preference for SPT style of engagement - one on one run through of longer-term outage plans in person. AI explained that where SPT done this in isolation from the ESO, this led to some customers thinking the dates were firm and led to complaints when SPT had to change dates on ESO instruction. SHE Transmission now involved with Commercial team liaison with customers which includes ESO attendance.

GP and IN - Both keen to see a percentage style measure for customers rather than a MWHR measure. i.e. outage hours p.a. divided by total annual hours (this then doesn't actually then need a MW figure). AI mentioned previous comments to discuss with NG ESO regarding available power signal to ESO to discuss measure of loss of MW production (ESO would need to call volume lost during outages - or would day ahead forecast be acceptable compromise for customers?).

Example to explain

A 100MW generator is required to be at 0MW for a TO outage that triggers the necessary clause within their BCA. The outage is due to last 37 days. The typical load factor of the generator in question is approx 40%.

Calculations for outage would be:-
100 x (37 / 365) = **10.14%** loss of annual network access
100 x 24 x 365=876,000MWHrs (TEC x hours in a year)
40% load factor reduces this to 350,400MWHrs - average annual output
37 day outage means reduction of **35,531MWHrs** of average annual output.

Which **figure** is best as KPI?

IN - Pointed out lack of measure to capture positive change i.e. early outage returns. Should form some correlation with average outage duration accuracy.

GP - KPI missing? There could be a scenario where a non-firm generator is disconnected for a major outage further into the network. (post discussion thoughts - this would still be captured under non-firm as the TO would need to record an outage on the customers connection asset. The outage booking should be clear as to the reason for the outage to cover this). AI - Cannot think of a scenario where this has occurred but will discuss with other TOs to see if they have experience.

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Survey Monkey Feedback (Anonymous)- Closed Friday 10th April

Although only 2 of those invited to the presentations responded to the survey, the feedback was inline

General Comments

- Comment made regarding the priority of maintenance dropping as it moves into Current Year – proposed modification has already been submitted to address this point.
- Survey was broadly scored positively apart from the question "Do you think the proposed KPIs will provide appropriate measure of the TOs application of the NAP?". Comment and response below.

KPI Feedback

- Comment that Demand Users are entitled to similar KPIs as their generation counterparts. "Number of times demand customers put at risk per annum KPI" proposed in response by respondent. (The new KPI "How many assets are out of service more than once per annum?" was intended as a measure of good planning practice for ALL assets, not just those affecting Users whether they be generation or demand. However, it was realised in discussion that more than one asset can put the same site at risk which would not be covered in the above KPI. This may need to be the case though so isn't necessarily a negative – further discussion required amongst TOs).
- Comment that NAP is in place for connected generation with little or no thought given to demand customers and their requirements in KPIs. (The NAP is very much about protecting demand customers, its first priority is a Safe and Reliable network. The NAP is also meant to minimise system access requirements where at all possible. This should reduce constraint costs, minimising costs for both generators and bill paying customers. Energy Not Supplied financial incentive schemes also ensure TOs do not place demand customers at any unnecessary risk and have funds available to further minimise risk. The above KPI, if adopted, may help address some of the respondents concerns but would need to be agreed with other TOs).

Survey Monkey result summary on next page. The strongly disagree comment relates to the feedback above regarding demand customers (DNOs) not being considered in KPIs.

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