

## Comments to Open Access Transmission Service (OATS)

<b>OATS Section</b>	<b>Comments / Question / Clarification</b>
<p><b>B4.2 Advance Notice of Material Change to Facility.</b> To the extent practicable, Connected Transmission Customers shall provide the Transmission Provider advance notice of any material change in its Facility's Generation and/or Load requirements.</p>	<p>Clarification : What is meant by "material Change" - can this be defined here or in the IRR</p>
<p><b>B5.5 Facilities to Interface SCADA.</b> The Connected Transmission Customer shall be responsible for the installation and maintenance of all necessary facilities to interface with the Transmission Provider's SCADA system.</p>	<p><b>In B5.1 Communication Equipment for Monitoring and Control.</b> "....the Transmission Provider shall provide all communication equipment required for monitoring and controlling the Point(s) of Connection and Generation Facilities, in accordance with the Grid Code..."</p> <p><b>In B5.4 SCADA Facilities.</b> "The Transmission Provider shall provide the SCADA facilities set out in the Grid Code and additional SCADA facilities as agreed with the Connected Transmission Customer..."</p> <p><b>In Grid Code 5.6.1 Communication System for Monitoring and Control</b> "5.6.1.2 The Grid Owner shall provide the complete communication Equipment required for the monitoring and control of the Connection Point and the Generating Units"</p> <p><b>In Grid Code 5.6.2 SCADA System for Monitoring and Control</b> "5.6.2.1 The Grid Owner shall provide a Remote Terminal Unit (RTU) for interconnection with the System Operator's Control Center, to serve as telemetry Equipment for monitoring..."</p> <p>Clarification :</p> <ol style="list-style-type: none"> <li>1. Why should the Transmission Customer be responsible for the installation and maintenance of facilities provided by the Transmission provider?</li> </ol>

<p><b>B5.6 Telecommunications Facilities to Link Station(s) to Existing Telecommunications Network.</b></p> <p>The Connected Transmission Customer shall be responsible for providing all telecommunication facilities necessary to link/connect its station(s) to the existing telecommunication network of the Transmission Provider. In particular, this obligation includes providing radio and/or an optical link of appropriate bandwidth to accommodate the communication requirements stated in these OATS Rules from the Connected Transmission Customer to the nearest or most feasible telecommunication node within the Transmission Provider’s telecommunication network.</p>	<p><b>In the Grid Code 5.5.1 Requirements Relating to the Connection Point</b></p> <p>“5.5.1.2 The connection Point shall be controlled by a circuit breaker that is capable of interrupting the maximum short circuit current at the point of connection”</p> <p>Questions:</p> <ol style="list-style-type: none"> <li>1. If a circuit breaker is required in a connection point, an RTU can be easily installed. SCADA is also required. Why link all customer’s stations to the network of the Transmission Provider.</li> <li>2. Why should the Transmission Customer provide for the telecommunication facilities when OATS B5.1, B5.4, Grid Code 5.6.1 &amp; 5.6.2 states that it should be the Transmission Provide who should provide such facilities</li> </ol> <p>Clarifications:</p> <ol style="list-style-type: none"> <li>1. For customers who are sole user of a transmission line but whose metering facilities are located at the customer’s end (say 5km away), are SCADA facilities still required</li> <li>2. For connection points with metering facilities which are used as alternate source only (for reliability), are SCADA facilities still required?</li> </ol>
<p><b>B5.9 Tele-protection paths.</b></p> <p>The Connected Transmission Customers shall provide redundant tele-protection paths between its station and the adjacent substations of the Transmission Provider, by using either of the following:</p> <ol style="list-style-type: none"> <li>(a) Power Line Carrier and Microwave Radio; or</li> <li>(b) Optical Fiber and Microwave Radio.</li> </ol>	<p>Comments:</p> <ol style="list-style-type: none"> <li>1. This is very expensive</li> <li>2.</li> </ol>
<p><b>B8.3 Access to each other’s Connection Facilities.</b> The Transmission Provider and each Connected Transmission Customer may open and/or disconnect the Connection Facilities of the other party in the event of, and for the duration of, any Contingency, if such opening or disconnection would reasonably be</p>	<p>Comment:</p> <ol style="list-style-type: none"> <li>1. Notification should be in writing not “verbally”</li> </ol>

<p>expected to mitigate or remedy the Contingency in accordance with Good Industry Practice and the Grid Code. A Participant exercising this right shall immediately, and not later than within the next twenty-four (24) hours, notify the other party verbally of its actions unless such information should have already been provided by Automatic Data Transfer.</p>	
<p>C3.2 The Transmission Provider shall report on Interruptions in the manner prescribed by the ERC in accordance with the Grid Code and shall compensate the Transmission Customer in the manner prescribed in Rule 11.2 in Annex II to Module F of these OATS Rules when the Transmission Customer's Power Delivery Service is interrupted or curtailed below a level(s) specified in their Service Agreement and the Interruption or Curtailment was caused by the Transmission Provider.</p>	<p>Clarification:</p> <ol style="list-style-type: none"> <li>1. What if the power interruption or load curtailment is caused by the Generating Company, say power shortage caused by low water level or one of the generating plant is our of service?</li> <li>2. How will the customer get compensation?</li> </ol>
<p><b>Annex II to these OATS Rules: Ancillary Services Purchase Agreement</b></p>	<p>Clarification:</p> <ol style="list-style-type: none"> <li>1. For Distribution Utilities with embedded generating plants and are capable of providing non-firm ancillary service (startup/backup power), will they be required to sign a contract to supply non-firm service</li> <li>2. How will they be dispatched?</li> <li>3. How will the energy/demand delivered/exported to the grid be measured?</li> <li>4. How will they be compensated?</li> </ol>
<p><b>Other issues:</b> 1. Loss compensation for using alternate route of energy which passes thru a DU's/customer's metering</p>	<p>Clarification</p> <ol style="list-style-type: none"> <li>1. There are situations where we use alternate route to get power. However, these routes passes thru the metering facilities of another DU.</li> <li>2. How will the additional losses imputed by the user be computed?</li> <li>3. How will the energy/demand registration be reconciled?</li> </ol>

	<ol style="list-style-type: none"><li>4. What if the resetting happens one day before the 25<sup>th</sup> of the month (meter reading day)?</li></ol>
2. Metering facilities	<ol style="list-style-type: none"><li>1. Transco should provide the customer with data to consider Time Of Use</li><li>2.</li></ol>
3. Contestable customers	<ol style="list-style-type: none"><li>1. For customers who buy power from the spot market, will the OATS apply to them?</li><li>2. Will they have to connect to the Transmission Provider and the DU?</li></ol>