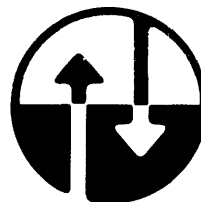


promoting the UK renewable energy industry



RPA
RENEWABLE
POWER
ASSOCIATION

David Haldearn
Director, Scotland and Europe
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Also by e mail
BETTA.Consultationresponse@ofgem.gov.uk

6th Floor
30 Millbank
London
SW1P 4RD

020 7963 5852 tel
020 7963 5921 fax

www.r-p-a.org.uk

5th February 2003

Dear Mr Haldearn

Response to first GB CUSC consultation

The Renewable Power Association welcomes the opportunity to comment on the above consultation.

The Renewable Power Association is a trade association representing producers of renewable energy. It is pan-technology – its members are involved in all forms of renewable energy, including biomass, wind energy, solar, biogas, energy-from-waste, landfill gas, hydropower, wave, tidal stream and sewage gas. Its membership also includes producers of heat and biofuels and those working in the field of hydrogen, fuel cells and recovery of waste heat, which, when combined with renewables, have the potential to offer a totally sustainable package. Legal, accounting and energy trading businesses are also represented.

Together the RPA's membership accounts for almost 70% of ROC-accredited generating capacity.

The RPA welcomes BETTA in so far as it may bring more opportunities for finding a market for the output of our members; particularly those in Scotland. There are just two specific points that we would like to make in connection with this consultation.

Transparency of Agreements

We welcome the introduction of more transparency into agreements that in Scotland are currently confidential bilateral arrangements.

Transmission/Distribution interface in Scotland

We would regret the passing of combined Transmission/Distribution access arrangements in Scotland. More critical however is the possibility that because 132kv lines are classified as transmission in Scotland transmission some “larger small generators”, including some that are license exempt become sucked in to more onerous requirements that are really only appropriate to plant connected at 275kv and above. Serious consideration should be given to classifying 132kv as Distribution in Scotland, as it is in England and Wales. The fact that in Scotland it is currently said to perform a “transmission” function should be viewed in the light that it is anticipated that all Distribution systems are going to become more active i.e. more like transmission in the future.

I hope you find the comments helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gaynor Hartnell', with a stylized, flowing script.

Gaynor Hartnell,
Director of Policy,
Renewable Power Association.