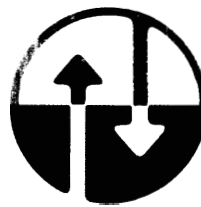


promoting the UK renewable energy industry



RPA
RENEWABLE
POWER
ASSOCIATION

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5th February 2003

Dear Mr Haldearn

The Balancing and Settlement Code under BETTA

The Renewable Power Association welcomes the opportunity to comment on the first GB Connection and Use of System Code 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 improve the prospects of finding a market for the output of our members, particularly those in Scotland. With respect to the GB Balancing and Settlement Code specifically, we would like to make three points.

Firstly we would not wish to see smaller generators sucked into complex trading arrangements purely by virtue of them being connected to a transmission system. This may be the case for larger renewable generators connected to the 132kv system in Scotland, which is classed as transmission.

We have proposed in response to other consultations that 132kv be reclassified in Scotland as Distribution, to conform to the rest of Great Britain.

Secondly although we hope our members will not be required to become direct parties to the Balancing and Settlement Code they will (like end customers) be directly affected by it and as such should have representation on the BSC panel by right.

As a final point it is not sensible to include the Shetland Islands within the main Great Britain arrangements whilst physical trade between them and the remainder of Great Britain is not possible.

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.