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David Halldearn
Director - Scotland and Europe
Ofgem
9 Millbank
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24 April 2003

Dear Mr Halldearn,

Response to conformance of standards under BETTA consultation

I refer to the Ofgem/DTI consultation paper "Planning and operating standards under BETTA" dated March 2003. The following response is made on behalf of British Nuclear Fuels plc and Magnox Electric plc.

BNFL Magnox Generation operates a number of Magnox nuclear power stations in England and Wales, and also Scotland in the case of the Chapelcross nuclear power station. Generally, these power stations export energy onto the transmission system. They may also, at times when reactors are shut down, import energy from the transmission system which may be used in part to power safety related equipment. We therefore consider it important that appropriate standards for security and quality of supply are maintained, and that any changes to those standards should receive careful consideration and scrutiny. This is the same view that we took (as Nuclear Electric plc) when NGC undertook a review of the Security Standard in 1993-4 at the request of OFFER.

Our experience is that even within England and Wales the security of supplies may vary widely between different connection points, even though although a single set of operational standards is in place. This would suggest that there are a number of determinants of the service delivered to transmission customers, of which the standards are only one. It may be worthwhile keeping this in mind during the development of this part of the BETTA programme.

We would support the broad thrust of the proposals contained within the consultation paper and summarised in Section 5.7. However, we would suggest that in the conclusions document, planned for June 2003, the opportunity is taken to clarify the intent behind some of the drafting of the current paper. Specifically, at various points the paper states:

- “it is not anticipated that there will be any significant change in the service delivered to transmission customers” (Section 1.7)
- “DTI/Ofgem believe that the security and quality of supply that different GB transmission customers would receive under BETTA is expected to be essentially the same as that which they received prior to the implementation of BETTA” (Section 5.4)
- “in any event, the security and quality of supply that different GB transmission customers would receive at day one of BETTA is expected to be the same as that which they would have received prior to the implementation of BETTA.” (Section 5.7)

We would welcome a single, categorical statement on the matter, to the effect that the security and quality of supply that different GB transmission customers will receive at day one of BETTA **will be the same** as that which they received prior to the implementation of BETTA, **unless modified by proposals forming part of the BETTA project which would identify the potential impact and be the subject of an Ofgem/DTI consultation.**

You will note that in our response to the Ofgem/DTI consultation on the development of the Grid Code under BETTA, which was sent to Bridget Morgan on 7th February, we expressed our view that it would be sensible eventually to include the planning and operating standards within the GB Grid Code. This would improve clarity and simplify governance arrangements.

I trust the above is helpful, and look forward to the publication of the Ofgem/DTI conclusions document in due course.

Yours faithfully,

Nigel Burrows
Regulation and Market Access Manager