

Date

28 April 2003

Our Ref

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David Haldearn  
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Dear David,

### **Planning and operating standards under BETTA**

We are pleased to have the opportunity to comment on this Ofgem/DTI consultation. We support the objectives of BETTA and wish to participate fully in the process of developing BETTA to meet these objectives. We have provided detailed comments on the issues raised by the consultation document in an attachment to this letter.

We believe that the implementation of BETTA will necessitate the conforming of security standards and therefore we support moves towards this. We consider that coherent operation of a fully integrated system can be achieved only by applying the same principles of acceptable and unacceptable risk across its entirety. We accept that full conformity of both operational and planning standards is not necessary (nor is it likely to be achieved) for day one of BETTA. However, the disadvantages in having three separate sets of security standards need to be overcome in the medium term.

We support the view that some conformity in the operational standards is both desirable and achievable in readiness for day one of BETTA. We also agree that the issues associated with conforming the planning standards are likely to be more complex, due, for example, to the previously unanticipated capital expenditure implications. The issues will need careful consideration.

We think it would be appropriate to strengthen the drive to achieve conformed standards at an early date.

Yours sincerely

**Denis Linford**  
**Head of Regulation**

**Planning and operating standards under BETTA – An Ofgem / DTI consultation.  
Ref. 14/03**

**LE Group Response**

**Summary**

The main points that LE Group wishes to make on this consultation are:

- We accept that full conformity of both operational and planning standards is not necessary (nor is likely to be achieved) for day one of BETTA.
- We support the view that some conformity in the operational standards is both desirable and achievable in readiness for day one of BETTA.
- We agree that the issues associated with conforming the planning standards are likely to be more complex than those for the operational standards. We therefore accept that it is unlikely that any degree of conformity in the planning standards will be achieved by day one of BETTA
- We think it would be appropriate to strengthen the drive to achieve conformed standards, at least in the medium term. We would want to see good progress made by the time that BETTA is implemented.

**1. General Comments**

- (a) On the recommendation of the transmission licensees that a more detailed review of existing standards be undertaken with a view to identifying which aspects may be practically harmonised under BETTA from day one.*

LE Group supports this intent. We note that the issues and interactions are complex. There are implications for previously unanticipated capital expenditure implications and customers will need to be consulted. In addition, regional variations in the impact and probability of unplanned events will need to be examined, with a view to establishing how they would be recognised in conformed standards.

- (b) That Ofgem / DTI should develop a timetable for this work with the transmission licensees and this timetable should subsequently be published.*

LE Group fully supports the discipline of achieving the work output to an agreed timetable. We would wish to see some application of 'drive' to further the work considered necessary.

- (c) That the work will be progressed by the transmission licensees and reported back to STEG.*

We view this as a satisfactory approach. However, we would suggest that STEG be involved in an iterative manner, in order to highlight any potential difficulties at the earliest possible time.

- (d) That any proposals relating to harmonisation of operational standards resulting from the above analysis will be the subject of an Ofgem / DTI consultation.*

We are pleased that we will have a further opportunity to comment on the specific details of a conformed operating standard before it is implemented.

- (e) That 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 received prior to the implementation of BETTA.*

We support the view of the existing three transmission licensees that the present standards are appropriate for the characteristics and risks associated with the networks to which they are applied. We accept that it is not intended that the implementation of BETTA should result in significant additional new costs resulting from moves to conform the security standards.

- (f) The fact that different standards may apply to different users of the GB transmission system should be taken into account in the development of the connection and use of system charging methodology to apply under BETTA.*

We agree with this statement but we see the need to overcome this complexity as a key driver towards conforming the security standards. We do not find it satisfactory that there should be an ongoing potential for an uneven playing field for system access, market access and compensation for unavailability of access.

- (g) That further consideration of operating and planning standards is expected to be initiated under the arrangements implemented by the grid and distribution code review panels in relation to governance of electrical standards.*

We would support this and reiterate that the development of planned changes for the implementation of BETTA will be best achieved if a strong level of industry participation, through expert working groups and steering groups, is encouraged. We would wish to see as much progress as possible made towards conforming the standards, at an early date.

**LEG Group/28.04.03**