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**17th November 2003**

Dear Ms Morgan,

**September 2003 Consultation : The Grid Code Under BETTA.**

BP Grangemouth welcomes the opportunity to respond to this consultation. Our current views are based on experience of smaller scale plant in Scotland where there are strategic business drivers for directly connected users that could be considered contrary to the intent of the grid code.

The Ofgem view that the UK Grid Code would not include the current Scottish Grid Code provision (CC1.3), which does not impose retrospective change to requirements, is considered by BP Grangemouth to be a significant change, which could have detrimental operational and commercial impacts to directly connected users based in Scotland.

It is noted that there is provision for derogation against certain technical requirements but the understanding of BP Grangemouth is that such derogations could include significant differences to the terms of current connection agreements between users and Transmission Licensees.

The view of BP Grangemouth is that any change of the terms of the existing connection conditions with which would have potential negative impacts on the regional security of current operations or impose additional commercial burden to users and generators, would be unreasonable.

We look forward to ongoing discussions throughout the BETTA project.

Yours sincerely

**Neil McCracken**

**Utilities Manager  
BP Grangemouth**