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25 November 2003

Dear Bridget,

The Grid Code under BETTA

EDF Energy welcomes the opportunity to comment on this Ofgem/DTI consultation on the Grid Code under BETTA. We support the objectives of BETTA and wish to participate fully in the process of developing BETTA to meet these objectives.

We continue to support the GB System Operator having the obligation to have in place a GB Grid Code, based on the existing England and Wales Grid Code and under the governance of a single Grid Code Review Panel. We accept the need for some regional differences to be retained within the GB Grid Code and agree that the Grid Code Review Panel should work to minimise these differences in the longer term.

We believe that effective and efficient co-ordination is required between all industry codes and this becomes increasingly important under BETTA with an increased number of codes and interactions between them. Our suggested approach to this issue would be to allow code Panels to set up joint working groups covering two or more codes that would develop and assess proposed code changes in a co-ordinated manner, with the remit of considering the implications of potential changes across the whole of the GB trading and transmission arrangements.

We broadly agree with the proposed composition of the Grid Code Review Panel but would suggest that if a Renewable representative is to be included then the small/medium generator representative should represent non-renewable generation.

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We agree with Ofgem/DTI's view that the matters under review in the GB Grid Code, which would have direct technical implications for the rights and obligations of transmission owners under the STC, would require input to the GB Grid Code Review Panel from transmission owners. We consider that this could be achieved by inviting the transmission owners to provide technical expertise to the GB Grid Code Review Panel meetings and sub groups as required.

We support the inclusion of recent approved changes to the England and Wales Grid Code, as detailed in Section 5 of the consultation document, in the GB Grid Code and the proposed consultation process for further changes approved prior to the third GB Grid Code consultation.

If you have any queries please do not hesitate to contact either Rupert Judson on 020 7752 2526 or myself

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Linford', with a stylized flourish at the end.

Denis Linford
Head of Regulation