

Bridget Morgan
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Ofgem
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Date: 3rd December, 2003

Dear Bridget,

Powergen UK response to GBGC OC Mini-consultation

Thank you for the opportunity to respond to the GB Grid Code Operating Codes mini-consultation. This response is on behalf of Powergen UK, Powergen Retail and Cottam Development Centre Limited.

OC1

There are already regional differences arising from the definition of Medium Power Station. In Scotland, this covers plant down to 5 MW capacity, whereas in England and Wales that limit is 50 MW. In an integrated system, it should be unnecessary to collect data at any level lower than 5 MW in Scotland or 50 MW elsewhere. As the requirements are harmonised to one limit, Powergen would be keen to see the new GB limit at or above 50 MW, not 5 MW.

We have already commented in another response that it is appropriate for Demand Control Notification Level to be set equal to the Customer Demand Notification Level. Our rationale is that both actions are taken by parties other than the System Operator, but have similar impact. However, we would welcome a review of the level set both within England and Wales (currently 12 MW), and Scotland (currently 5 MW).

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OC2

Powergen is able to support the change in definition of Gensets to include all directly connected generating units. However, if operational experience proves that the change was unnecessary (either because of the small impact of non Large Power stations, or because in practice none are built) then we reserve the right as usual to raise the issue with NGC via the GCRP.

The proposed Clause OC2.1.8 intending to relieve administrative burden on low impact Users is sensible. However, it would be useful if the System Operator were to indicate likely levels of generation or demand to which this provision might be applied. Also, is there any reason why the provision cannot be extended to England and Wales?

Concerning the impact of the Moyle Interconnector compared with that of the French Interconnector, it seems inappropriate to retain different requirements, unless the data needs are genuinely different.

The two MW difference regional variation proposed for automatic and manual load transfer capability is an obvious candidate for harmonisation at this stage, rather than waiting for a change proposal after BETTA is implemented. Unless it can be shown that there would be significant operational difficulties arising, the level should be set to 12 MW for both regions.

OC6

We welcome the decision to standardise the percentages of demand reduction to be available.

We believe that changing the percentage of demand on automatic low frequency would be inappropriate at the moment. However, it would be of interest to know whether there are any plans to conduct a review in Scotland such as that referred to in England and Wales.

If governance arrangements which allow for industry consultation are required for the Table currently contained in BGSA, then it would be sensible to put it into Grid Code. If however, it is publication of notified data, then the Seven Year Statement would be a more appropriate home.

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OC7

We have no comments.

OC9

A minor drafting point in OC9.4.1, OC9.4.6, OC9.4.7.3, OC9.4.7.8, OC9.4.7.9 and OC9.6.8 is that "System Operator's" should have the space between the r and the apostrophe removed.

OC10

We do not believe it is necessary to include Scottish Suppliers in the scope of OC10.

OC12

We have no comments.

If you have any queries, please do not hesitate to contact me on 024 7642 5378.

Yours sincerely,

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