

Our Ref
Your Ref

Bridget Morgan
Technical Directorate
Office of Gas and Electricity Markets
9 Millbank
London SW1P 3GE

Date 5 December 2003

Dear Bridget

GB Grid Code: Operating Codes 1, 2, 6, 7, 9, 10, 12

EDF Energy welcomes the opportunity to comment on this Ofgem/DTI mini consultation on the GB Grid Code - Operating Codes.

We have provided our views on some of the specific issues identified by Ofgem in an appendix to this letter.

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

Yours sincerely

Denis Linford

Head of Regulation

EDF Energy views on GB Grid Code: Operating Codes 1, 2, 6, 7, 9, 10, 12

Grid Code Reference	Issue	EDF Energy Comments
OC2.1.8	Proposed drafting relating to provision of planning information by small users.	We agree with the proposed new clause.
OC2.3.1 5.18 and 5.19	Regional differences in the provision of demand information to system operator by interconnector users.	We do not see any reason to retain a regional difference for interconnector users in respect of information provision to the system operator.
OC2.4.1	Information requirements for radio teleswitching in Scotland.	We believe that the GB Grid Code should include information requirements relating to the use of radio teleswitching if this activity has the potential to impact on system operation. We see no reason why such requirements should not apply to the whole of GB.
OC6.6.1	Low frequency demand disconnection schemes.	We believe that the required levels for low frequency demand disconnection should be aligned in due course but agree that a regional difference should be retained in the interim.
OC6.7.2	Requirement to provide information on demand disconnection available at each GSP including a minimum 20%. Possible regional difference for Scotland.	We agree that some GSPs in Scotland may not be able provide 20% automatic demand disconnection. We believe that the GB Grid Code should not include requirements that cannot be met physically and therefore a regional difference seems appropriate. However, this should be worded so that only those GSPs that cannot meet the requirement are exempted.
OC10.3	Inclusion of suppliers within the scope of event reporting of actions relating to load management blocks.	We do not believe that the use of load management blocks is such that there is a need to include suppliers within the scope of OC10.