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Dear Bridget

GB Grid Code Operating Codes 1,2,6,7,9,10,12 Ofgem/DTI mini-drafting Consultation

Further to our comments dated 25th November 2003 on Consultation Volumes 1 and 2, RWE Innogy provides the following comments on the mini-consultation dated 31st October 2003. Where we have not provided any specific comments we are supportive of the relevant E&W Grid Code provisions being applied in the GB Grid Code.

Operating Code 1

As stated in our response to Volumes 1 & 2, it is our view that the 12 MW level in E&W places an unnecessary burden on Suppliers and should be increased to a more realistic level of between 50 MW and 100 MW. Consequently, we fail to understand the need for a level as low as of 5 MW in Scotland and suggest that it should be set at a level at least equal or greater than the 12MW level currently applied to E&W.

Given the reduced MW level in Scotland at which it is proposed Medium Power Stations are defined, we would expect that the SO would have sufficient data to carry out its duties without requesting information from Small Power Stations.

Operating Code 2

We welcome the change from the outage approval process currently defined in the SGC to an outage co-ordination process defined in the E&W Grid Code.

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We are supportive of the proposal to reduce the administrative burden for Users wherever possible. However, we would prefer this to be achieved through a change to definition of the regional size of generation / demand that is captured by the requirement, as opposed to a discretionary arrangement.

Operating Code 6

Our overriding view with respect to demand control is that it should, as far as reasonably practicable, be spread over as many Users as possible with a minimum number of exceptions. Should demand control be applied to one particular group of Users, not only would that group be subject to interruptions but their Supplier would be exposed to the imbalance risk arising from demand control.

Operating Code 7

We have no comments on the proposed changes to OC7.

Operating Code 9

We have no comments on the proposed changes to OC9.

Operating Code 10

Given that OC10 is concerned with the reporting of Significant Incidents, we agree with the proposal that the Supplier in Scotland will no longer be involved in this process. Indeed, the E&W Grid Code acknowledge that the System Operator has no knowledge of the relevant Supplier with respect to operational activities (e.g. OC6.3.2.2 (c)).

Operating Code 12

We have no comments on the proposed changes to OC12.

I trust that you will find the above comments helpful.

Yours sincerely

John Norbury
Network Connections Manager