



Patrick Smart
BETTA Project
Ofgem
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Reference:

Dear Patrick,

Provision of User Outage Proposals (Grid Code OC2 data) to transmission owners for transmission outage planning purposes under BETTA

Powergen does not in principle support the release of OC2 data to the Transmission Owners (TOs), but accepts that on balance that it may be necessary in order to provide the most efficient arrangements for planning outages on the GB transmission system. However, should OC2 data be provided to TOs, we would expect robust confidentiality obligations to be strictly enforced through the transmission licences.

As a matter of principle we believe that the TOs should receive only that data which is necessary for them to carry out their specified role. This is especially important in relation to those TOs with trading interests, in order to both to protect those companies from accusations of misusing the data and to provide comfort to other market participants that the data is being used purely for the purposes for which it was intended. Therefore, as the GB System Operator is to be responsible for carrying out system planning for the GB transmission system, we would not ordinarily expect the TOs to be given outage data from users. However, we accept that it may be necessary to provide OC2 data to TOs for efficiency reasons.

If the data is provided to TOs, then we would expect there to be robust provisions in place to ensure that it is used solely for the purposes for which it was intended. We do not believe that this information would only be of limited use for a trading party. We also do not agree that the data is something that

TOs will be receiving anyway from other sources, for instance for safety purposes. As you note in the consultation paper, this information will be more detailed than that TOs would normally receive and is likely to be provided more promptly. Such information if it were passed to a trading business could provide it with a significant advantage over its competitors. Therefore, it is imperative that strict confidentiality conditions are included in the licences of the TOs preventing the information from being used for any other purpose and that these are rigorously enforced.

I hope the above proves helpful. I would be happy to discuss any of these issues further.

Yours sincerely,

Paul Jones
Trading Arrangements