

RWE Innogy



Mr Patrick Smart  
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Dear Mr Smart

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

Thank you for the opportunity to comment on the above BETTA mini-drafting consultation dated February 2004. In response, the following comments are provided on behalf of the RWE (i.e. RWE Trading GmbH, RWE Innogy plc, Innogy Cogen Ltd., Innogy Cogen Trading Ltd., Npower Ltd., Npower Northern Supply Ltd., Npower Yorkshire Supply Ltd, Npower Northern Ltd, Npower Yorkshire Ltd. Npower Direct Ltd):

Whilst we share Ofgem/DTI's concern with the release of commercially sensitive OC2 data to TOs for outage planning purposes, given the TOs affiliated activities in generation, we also accept that the TO will require generator outage data in order to optimise its transmission outage plans. However, it must be recognised that the TOs have developed relatively successful generation businesses within their transmission areas and, to ensure that other competing generators are not disadvantaged within a TOs transmission area post-BETTA, it must be demonstrated that these affiliated businesses operate independently of the TO activities. We therefore look to Ofgem/DTI to ensure that the TOs are provided with only a minimum amount of data that is required for them to carry out their licensed duties efficiently and that adequate safeguards are in place to ensure that such commercially confidential data is not leaked into the TOs affiliated businesses.

Yours sincerely

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