

Patrick Smart
BETTA Project
Office of Gas and Electricity Markets (Ofgem)
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4 March 2004

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Dear Patrick,

**Provision of User Outage Proposals (Grid Code OC2 data) to transmission owners for transmission outage planning purposes under BETTA
An Ofgem/DTI mini consultation document
February 2004**

Thank you for the opportunity to respond to this consultation. This response is submitted on behalf of ScottishPower UK Division, which includes the UK energy businesses of ScottishPower, namely ScottishPower Energy Management Ltd, ScottishPower Generation Ltd and ScottishPower Energy Retail Ltd.

ScottishPower UK Division is aware of Ofgem/DTI's continuing concern regarding the role within BETTA of transmission licensees with affiliated generation and supply businesses. In the case of the outage planning procedure and the use of OC2 data we believe that a pragmatic view should be taken of all the factors surrounding the possession and use of OC2 data in order to design and agree a planning procedure which best meets the needs of all the parties without resulting in excessive costs which will ultimately be paid by the end customer. We note from the consultation document that all the transmission licensees are of the view that the TOs should have access to relevant OC2 data, i.e., the OC2 data relating to users connected to their transmission systems located in their transmission area. Having examined Ofgem/DTI's analysis of the situation it is clear that the efficiency of the outage planning process will be significantly impaired if relevant OC2 data is not provided to the TOs by the GBSO, while the exclusion of the TOs from access to this data cannot be achieved due to the inevitable involvement of TO staff with generator outages.

ScottishPower UK Division therefore agrees with the proposition that TOs should have access to relevant OC2 data, i.e., the OC2 data relating to users connected to their transmission systems located in their transmission area. We expect Ofgem/DTI to ensure that appropriate confidentiality requirements are imposed on the TOs.

ScottishPower UK Division also agrees that it is appropriate that TOs should produce the first iteration of the draft outage plan in the STC outage planning process in relation to their own transmission system taking into account the OC2 data that the GBSO has provided. This seems to us to be the most efficient way of producing the overall GB outage plan.

I hope that you find these comments useful. Should you have any queries on the points raised, please feel free to contact us.

Yours sincerely,

Mike Harrison

Commercial Manager, Trading Arrangements
ScottishPower Energy Management Limited