

Bridget Morgan Technical Directorate Ofgem 9 Millbank London SW1P 3GE

Date: 8th March 2004

Dear Bridget,

Response to GBGC OC8 Mini Consultation

Thank you for the opportunity to respond to the consultation on GBGC OC8, OC11, and BC's. This response is on behalf of Powergen UK, Powergen Retail and Cottam Development Centre Ltd.

We have no adverse comments on the drafting for OC8 or OC11.

Balancing Codes

Our comments made in September of last year regarding the definition of Small, Medium, and Large Power Stations are still applicable.

If Cascade Hydro schemes are treated as single BMUs under BETTA, there seems little reason why there is any necessity for additional provisions for data submission over and above the normal dynamic data set, since dynamic data can be changed to reflect the capability of the plant. The provisions of SCG SDC2 4.5 do not appear to add anything to this data set. If it is considered that there is an issue, then that could be addressed in a similar way to the CCGT matrices which exist under E&W Grid Code.

If you have any queries, please do not hesitate to contact me on 024 7642 5378. Yours sincerely,

Claire Maxim Senior Commercial Analyst Powergen UK plc Westwood Way Westwood Business Park Coventry CV4 8LG T +44 (0) 24 7642 5378