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Dear Bridget

GB Grid Code: Operating Code 8 (SGC OC6), Operating Code 11 (SGC OC9) and Balancing Codes

Thank you for the opportunity to comment on the above BETTA mini-drafting consultation dated 10th February 2004. In response, the following comments are provided on behalf of 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):

Operating Code 8 – Safety Co-ordination

We are generally satisfied with the proposals but have the following suggestion:

OC8.1.1 Substitute “It is recognised that Relevant Transmission Licensees are not required to comply with this Grid Code” with “It is recognised that Relevant Transmission Licensees do not have a licence obligation to comply with this Grid Code”

It is assumed that any change arising from NGC’s paper GCRP 04/05 discussed by the GCRP on the 26th February 2004 will be incorporated within the BETTA proposals.

Operating Code 11 – Numbering and Nomenclature

We are generally satisfied with the proposals.

Balancing Codes (BC)

Given that no further changes to the drafting of the BCs has been proposed in this paper we look forward to receiving the next full GBGC consultation paper, in which the responses to the September 2003 consultation will be considered.

Yours sincerely

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