

SPT Response to Ofgem/DTI Consultation July 2004

Provisions for the transition to the GB CUSC, the GB Grid Code and GB connection and use of system under BETTA

SP Transmission Ltd (SPT) welcomes the above consultation and endorses the approach contained therein. There are few comments, which SPT would wish to make, and those that follow are more commonly seeking clarification of certain points.

Transitional provisions

Interface Agreements

SPT notes that it is the intention that Users and Relevant Transmission Licensees enter into Interface Agreements under the CUSC. Given that such arrangements, which as the name suggests, relate to property and access rights SPT considers that there may be scope for continuing the current interface arrangements where these are already in place. Given the nature of these Agreements, such an approach will be more efficient and cost effective.

Confidentiality and Provision of data

It should be noted that the current Scottish Transmission Licensees are subject to strict confidentiality restriction not only by virtue of the existing bi-lateral agreements, but also by their Transmission Licences.

Ofgem/DTI consider that it will be necessary for certain User data to be provided to NGC during the transition period and suggest that this could be derived either directly from the User or via the Relevant Transmission Licensee. This may well be the case and SPT would only point out that in terms of its existing licence provisions it is required to hold any such data as confidential. It may release the data with the consent of the User, but in the circumstances of BETTA transition it may be quicker if such data were sourced directly from the User by NGC.

Uncompleted requirements for transition

At a number of points throughout this consultation the text suggests that ongoing matters may be dealt with by NGC carrying out a consultation. While this is undoubtedly a pragmatic way forward, such consultation and in particular the consultation timetable should be approved by Ofgem.

Uncompleted enduring requirements

As pointed out in previous consultations the failure to determine rights of access to the GB transmission system is blighting the development of SPT's business and a speedy and equitable resolution to this issue is urgently required to minimise further loss.

Appendix 3 Scottish Grid Code licence condition

The proposed condition 14 suggests that the Scottish Transmission Licensees comply with the provisions of the Grid Code applicable to them. Given that neither Scottish Transmission Licensee will be a party to the GB Grid Code some clarification would be welcomed here that the Scottish Transmission Licensees will only be required to comply with those enduring provisions of the code that will be applicable to them.

Appendix 9 GB CUSC Section 12 – BETTA transition issues

The proposed wording of 12.2.8 (Interface Agreements) may be amended should SPT's suggestion that existing agreements remain in place be adopted.

The Appendix set out at the end of section 12 should contain a statement that these are the matters known to require amendments to the GB CUSC, but that other areas may require amendment or insertion following the outcome of ongoing consultation.

SP Transmission Limited
23 July 2004