



*taking care of the essentials*

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Our Ref.  
Your Ref.  
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Dear Mr Halldearn

### **The initial allocation of GB transmission system access rights under BETTA**

Thank you for the opportunity to comment on the proposed legal text for the transmission licence conditions relating to the initial allocation of access rights under BETTA.

Centrica welcomes the intent to keep the rights of existing generators under BETTA equal to those they hold under the current arrangements. We note with interest the references to enduring arrangements. We recognise that there may be a need for GB transmission access rights to be reviewed in the future, particularly in light of the impending development of renewable generation, both on and offshore. However, we urge Ofgem/DTI not to act prematurely in introducing any significant changes prior to the implementation of BETTA. In addition, any changes to the access rights must take account of the transmission charging methodologies and co-ordinate changes to ensure the most cost-effective arrangement for customers is implemented.

Generally, we believe the legal text matches the intent as stated in the conclusions document. However, Paragraph 3 of the draft transitional licence condition for NGC refers to Section 12 of CUSC. This should be amended, presumably to Section 2.

We also suggest that some of the timescales within the legal text are revisited as the current drafting appears to implement different arrangements for Scottish users than those in England and Wales. It is essential that allocation is consistent across GB.

We trust these comments have been helpful and would be happy to discuss any of the issues raised in more detail.

Yours sincerely

Danielle Lane  
Centrica plc

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