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Monday, 23rd August 2004

Dear David,

Response to Conformance of Standards under BETTA consultation

Thank you for the opportunity to comment on the Conformance of Standards under BETTA. This response is on behalf of E.ON UK and Cottam Development Centre Ltd.

The new document presents the total requirements for grid system users in a concise and transparent form, which we welcome. Although the document contains some differing requirements for England and Wales and for Scotland, we recognise that the respective systems have operated satisfactorily until now, and thus there is no compelling case for instant harmonisation.

We note the two options presented for criteria to determine how much overhead line can be contained within a generation circuit. The first option continues a significant difference between England and Wales, and Scotland. Given that the criteria are applied to new build, this would be an area in which new build could be achieved to harmonised standards; therefore we would prefer that the regional difference should be abandoned for new build. The alternative option would allow a customer to request a relaxation from the more onerous England and Wales standard, which would be applied universally. It is by no means clear how a relaxation request would be judged, and the second option leads to less transparent connection requirements. If the same requirement cannot be applied to all new build, then we would prefer option one.

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Paragraph 2.12 – the wording from current NGC SQSS 1.12 regarding planning involving consideration of operation and maintenance has been moved to the Generation section only. We believe that this is a general philosophy, which should be applied to Demand and the Main Interconnected System too (Sections 3 and 4).

Paragraph 2.13 should be reworded to “The operational measures to be considered ~~are~~ include.....”. This is because the list contained in the drafting is not exhaustive.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Claire Maxim
Lead Contract Manager