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Dear David,

Planning and Operating Standards under BETTA

I am writing in response to the Ofgem/DTI consultation on the proposed Planning and Operating Standards under BETTA. We are in agreement in principle with the proposals to have a single set of GB planning and operating standards. However we do have a number of points as set out below that we believe need to be addressed.

Section 4.10 states that investment should be made in transmission capacity to satisfy the relevant criteria except where “operational measures suffice to meet the criteria in paragraphs 4.8 and 4.9 provided that maintenance access for each transmission circuit can be achieved and provided that such measures can be economically justified.” There is a potential problem here in that the TO will be able to assume that connected parties will comply with the minimum requirement of the Grid Code, but would not necessarily be aware of any additional facilities over and above these minimum requirements that might be available. For example there may be ancillary service contracts in place between the GBSO and a customer that could avoid or defer transmission investment. There would need to be a mechanism so that TO can be made aware of the relevant parameters of any such arrangement so that the transmission system can be economically planned.

In Section 6, Tables 6.2 and 6.4, there is an inconsistency between the NGT Planning and Operational standards for voltage step change following a fault which includes a supergrid transformer. The notes attached to these Tables indicate that NGT should plan for a -12% step for a supergrid transformer fault but are not allowed to operate to this standard. We believe that this inconsistency should be corrected.

Given the increasing volumes of renewable generation which have an intermittent characteristic, it is important that the different types of generation are dealt with appropriately within the new standard to maintain the security of the network. It is suggested that the definition of factor AT within Appendix C should be more general to reflect this. It is suggested that the wording be modified to "an availability representative of generators of type T at the time of system peak demand".

If you need any further information on the above comments, please give me a call.

Yours sincerely,

Rob McDonald
Director of Regulation