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Monday, 7th February 2005

Dear David,

E.ON UK response to the Third "Treatment of Embedded Exemptable Large Power Stations under BETTA" Consultation

Thank you for the opportunity to respond to the third Treatment of EELPS under BETTA consultation. This response is on behalf of E.ON UK, E.ON UK CHP Ltd, Citigen (London) Limited and Cottam Development Centre Limited.

Our comments are mainly restricted to the drafting proposed under this consultation.

Grid Code

Glossary and Definitions

"Control Point" – part c) of the definition would be clearer if a comma were inserted after "or Generating Unit".

"Generating Unit Data" – part b) does not entertain the possibility of compliance with part of BC1 or part of BC2, but implies total compliance with all parts.

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Balancing Code 1

BC1.4 – a Generating Unit will not necessarily be aware of how much of its generation is likely to appear at a Grid Supply Point, since it will not have access to the demand profiles under the Grid Supply Point.

BC1.4.1(a) implies that all Generating Units will be covered by CC.6.5.8. We are not yet aware of any proposals by NGC as to how they intend this requirement to be implemented.

BC1.4.2(a)(2) puts this requirement upon all Generating Units, not just those specified in the BELLA, particularly given the reference in BC1.4.2(a)(1) which specifically refers to Generating Units (as defined in the Glossary and Definitions). It is still unclear why NGC need this data to operate the system, when they cannot accept Bids or Offers to alter the generation of a Generating Unit, and do not notify Network Operators of Indicative Synchronising or Desynchronising times.

Balancing Code 2

BC2.4 explains that information collected under BC1 will be used, but it is unclear exactly what use such information is to NGC.

BC2.5.2.2 cannot be complied with. For example, individual generators with a wind farm will synchronise and desynchronise automatically. While this issue may well be dealt with by the Generic Provisions consultation process, it seems ill advised to introduce this requirement at this stage.

BC2.6.1(a) specifies a communication route for dealing with changes to MELs etc. However, again for windfarms, keeping MELs precise is a challenge, and NGC may well find themselves overwhelmed with telephoned data.

Both BC1 and BC2 appear to be asking for a level of detailed data far beyond that currently required by the TO. It remains unclear why NGC require more data given that the technical characteristics of the Transmission System, the Distribution Systems and the Power Stations concerned have not changed.

Operating Code 5

Other than the difficulty of complying with the requirements of BC1 and

BC2 for intermittent generation, we have no adverse comments on the changes to OC5.

General Conditions

The change wrought by GC.A2.12, which bind EELPS to various Connection Conditions, are more onerous than those envisaged by the Generic Provisions proposals. They should be realigned with those proposals.

CUSC

Section 1

1.5.5 – It may be appropriate to allow an EELPS to be energised before it receives its Operational Notification, since the Operational Notification may rely on the results of tests carried out while the Generating Unit is synchronised.

STC, Licence Conditions – no comments

If you have any queries, please do not hesitate to contact me on 024 7642 5378.

Yours sincerely

Claire Maxim
Lead Contract Manager