



SP Transmission & Distribution

David Haldearn
Director – BETTA and Europe
Ofgem
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Your ref

Our ref

Date

7 February 2005
Contact/Extension

Dear David

Treatment of Embedded Exemptable Large Power Stations under BETTA Ofgem conclusions and consultation on Code Changes

SP Transmission & Distribution (SP T&D) is pleased to have the opportunity to respond to Ofgem's conclusions on the above consultation and to the proposals for code changes to the CUSC, the Grid Code and the STC.

Connection Site Specification

We note and agree with Ofgem's conclusion that there is no mechanism whereby a Transmission Owner may specify site-specific technical conditions for embedded generators as it may for a directly-connected generator through the Connection Site Specification. Our view is that Ofgem's specific wording proposals in respect of the STC Section D deals appropriately with this matter.

Obligations on SPT&D: STC 114 and CUSC 6.5.1(c)

We note and are disappointed with Ofgem's conclusions in respect of obligations on Transmission Owners and DNOs to ensure EELPS accession to the CUSC. We still consider that it is only appropriate to place a "reasonable endeavours" obligation on both via the proposed STC and CUSC, rather than the "best endeavours" obligations proposed in the drafting.

We SP T&D would also ask for guidance as to exactly how we can discharge this obligation as a matter of fact. SP T&D cannot see what steps it could take, and we would therefore seek specific guidance on this matter.

Members of the ScottishPower group

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Timescales for Agreements

SP T&D notes and approves of Ofgem's proposals in respect of providing additional time and flexibility for Users to agree with NGC on whether their agreements should be either BEGAs or BELLAs. SP T&D would welcome clarification of the proposed implementation timetable for these reforms.

I trust that you find these comments helpful, and would be pleased to discuss them with you further, should you think that necessary.

Yours sincerely

David A C Nicol

SO/TO Workstream Manager