



SP Transmission & Distribution

Bridget Morgan
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Your ref

Our ref
Our Ref

Date DN

Date

29th June 2005

Contact/Extension
Contact / Extension

David A C Nicol /
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Dear bridget

Lifetime derogations for Scottish Generators against specific Grid Code conditions

SP Transmission is broadly supportive of the approach to lifetime derogations taken by Ofgem in this consultation paper. SPT will confine its specific remarks in respect of the performance of Generating Units could particularly affect its obligations under its Transmission Licence.

Connection Conditions CC6.3.2

Lifetime derogations against CC6.3.2 have been requested in respect of

- Units 7 and 8 at Hunterston Power Station
- Units 1 and 2 at Torness Power Station
- Units 1,2,3, and 4 at Longannet Power Station
- Units 1,2,3,4 at Cockenzie Power Station
- Units 1,2,3,4 at Cruachan

As Ofgem notes, SPT have previously commented that the requested derogations do not have any impact on the security and quality of supply for SPT's transmission system. SPT continue to hold this view.

We would also specifically support Ofgem's comment that "refurbishing generators to achieve full compliance and gain additional reactive capability is unlikely to be as economically efficient as installing reactive compensation on the transmission system".

We would further note that most of the derogations for plant in the SPT area are against original design limitation, and pre-date the Grid Code. The Scottish Grid Code did not seek retrospective compliance on vesting (SGC CC 1.3), whereas the England and Wales Grid

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Code process was to grant derogations against non-compliant generators on vesting. It is therefore consistent for us to support the granting of lifetime derogations on these matters.

I trust you will find these comments helpful, and would be pleased to discuss any detailed points with you further.

Yours sincerely

A handwritten signature in black ink that reads "D. A C Nicol". The signature is written in a cursive style with a large initial 'D'.

David A C Nicol
STC Manager