



The Company Secretary
SP Distribution Ltd
1 Atlantic Quay
Robertson Street
Glasgow
G2 8SP

Promoting choice and
value for all customers

Your Ref: COM-06-004
Our Ref: RBA/DPC/SOC
Direct Dial: 020 7901 7255

Cc Tony McEntee (by email only)

15 November 2006

Dear Colleague,

Decision in relation to modification proposal to the connection charging methodology: Small Embedded Power Stations

On 24 October 2006, Scottish Power Distribution Ltd ("SPD") submitted to the Gas and Electricity Markets Authority ("the Authority")¹ a proposal to modify its connection charging methodology.

The proposal modifies the connection charging methodology statement by the addition of a section on small² embedded power stations within the area of generator connections, providing clarification of the SPD's role.

Having carefully considered the issues raised in the proposal, the Authority has decided not to veto the proposed modification.

This letter sets out the background to the modification proposal, explains briefly the proposed changes and sets out the reason for the Authority's decision.

Background

SPD has licence obligations³ to have in place as of 1 April 2005 three charging statements: the statement of use of system charging ("UoS") methodology, the statement of UoS charges and the connection charging methodology statement. The connection charging methodology outlines the method by which connection charges are calculated. SPD has a requirement to keep the methodology under review and bring forward the proposals to modify the methodology that it considers better facilitate achievement of the relevant objectives.⁴

¹ Ofgem is the office of the Authority. The terms 'Ofgem' and the 'Authority' are used interchangeably in this letter.

² A Small Power Station is defined in the Grid Code, available at:
<http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/>

³ Standard licence conditions 4-4B

⁴ The relevant objectives for the connection charging methodology, as contained in paragraph 3 of standard licence condition 4B of SPD's licence are:

- (a) that compliance with the connection charging methodology facilitates the discharge by the licensee of the obligations imposed on it under the Electricity Act 1989 and by this licence;
- (b) that compliance with the connection charging methodology facilitates competition in generation and supply of electricity, and does not restrict, distort or prevent competition in the transmission or distribution of electricity.

SPD Modification proposal

SPD proposes to clarify the connection charging methodology statement by:

- the addition of a new sub-section to section 2.5 for Small Embedded Power Stations which are connecting or are intending to connect to its Distribution System.

SPD considers that this proposed change acknowledges the change to the Connection and Use of System Code ("CUSC") regarding small embedded power stations. SPD notes that it is now required to submit a request for a statement of works to National Grid Electricity Transmission plc ("NGET") for small embedded power stations requesting to connect to the distribution system which it considers are *likely* to have an effect on the transmission system. SPD also notes that NGET may levy charges on SPD for study works to assess the impact of the generator on the Transmission System.

SPD considers that the proposed change is justified as it will allow the methodology to better meet the relevant objectives as set out in SLC 4B paragraph 3.

The Authority's decision

The Authority has considered the proposal against the relevant objectives and wider statutory duties.

We note that the amendment to the CUSC sought to clarify the process followed by a DNO and NGET prior to the energisation of embedded medium⁵ power stations and certain types of embedded small power stations and set out that NGET may charge a DNO for the provision of a statement of works. The SPD modification proposal states that when NG levies charges on SPD for the cost of a study to assess the impact of the generation on the transmission system, then SPD will transfer these costs onto the party seeking connection. We consider that by explicitly stating the circumstances where charges for a statement of works may be payable by a party seeking connection to the SPD distribution system enhances the transparency of the methodology for users.

The Authority has decided not to veto the modification to the connection charging methodology statement.

Please contact Laura Nell on 020 7901 7201 if you have any queries in relation to the issues raised in this letter.

Yours faithfully,



Martin Crouch
Director, Distribution

Signed on behalf of the Authority and authorised for that purpose by the Authority

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- (c) That compliance with the connection charging methodology results in changes which reflect, as far as is reasonably practicable (taking into account of implementation costs), the costs incurred by the licensee and its distribution business; and
 - (d) that, so far as is consistent with sub-paragraphs (a), (b) and (c), the connection charging methodology, as far as is practicable, properly takes account of developments in the licensee's distribution business.

⁵ A Medium Power Station is defined in the Grid Code, available at:
<http://www.nationalgrid.com/uk/Electricity/Codes/gridcode/>