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Our ref

Your ref

Date

27 July 2007

Dear Colin

Offshore Electricity Transmission – Joint Ofgem/BERR Policy Statement

Thank you for the opportunity to comment on the Joint Ofgem/BERR Policy Statement. I am writing on behalf of Western Power Distribution (South West) plc and Western Power Distribution (South West) plc.

We have some comments in relation to Chapters 7 and 8.

CHAPTER: Seven

Question 1: Do you agree with our proposals for connection via distribution networks as outlined in this chapter? In particular, we would welcome your views on:

- comparable types of connection;
- charging arrangements; and
- connection application processes.

Question 2: Do you feel that there is any aspect of connection via distribution networks that we have not considered sufficiently?

We agree that treating embedded offshore transmission networks in the same way as large embedded power stations is appropriate. We also agree that there could be benefits in developing standard connection and use of system arrangements within the DCUSA framework.



We would be concerned at any reduction in the time available to distributors to prepare a connection offer as large connections are complex and the current timetable is already tight. In particular, the connection of a large embedded power station requires the agreement of National Grid and any reduction in the time to prepare a connection offer would require a reduction in the time for National Grid to assess the impact on the main transmission network.

CHAPTER: Eight

Question 1: Do you agree with our proposals for charging, access and compensation as outlined in this chapter? In particular, we would welcome your views on:

- the development of charging arrangements;*
- access products; and*
- compensation proposals, particularly whether there should be a penalty only regime in place for the OFTO.*

Question 2: Do you feel that there are any aspects of charging, access and compensation that we have not considered sufficiently?

We note and agree that in treating offshore transmission connections as large embedded power stations that compensation payments will not be due for constraints caused by the distribution network. Instead the current arrangements of network unavailability rebate payments would apply provided the connection to the distribution network was a standard arrangement.

I hope these comments are helpful. If you would like to discuss our concerns further please contact Nigel Turvey, Design & Development Manager on 0117 933 2435 or at nturvey@westernpower.co.uk.

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager