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Our ref

Your ref

Date

20 September 2007

Dear John,

Electricity Distribution Network Planning – Eng Rec P2/6 Consultation

I am writing on behalf of Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc in response to your consultation letter of 1st August 2007 on Engineering Recommendation P2/6 (ER P2/6) which covers security of supply standards.

Summary

Western Power Distribution (WPD) believes that ER P2/6 has served the electricity industry in the UK well in delivering secure and reliable supplies. This is supported by the KEMA report¹ which states that the distribution network performance indices for Britain compare favourably with the networks from other developed countries. Although the document must set the design standards for the future networks, we do not believe major revisions are required at present and the document should continue to be the basis of network security design standards.

Licence Drafting

WPD acknowledges that there may be a lack of clarity between the Licence requirements for networks to be designed ‘not less than that set out in ER P2/6’, and the ER P2/6 document that is a ‘recommendation’ and ‘intended as a guide to system planning’. Section 2 of P2/6 is however quite clear that Table 1 sets out ‘normal levels of security’ and that ‘any departure from the recommended normal level of security may require detailed risk and economic studies to be undertaken’. Also, via a footnote, it refers to ‘a deferment of reinforcement may require a derogation to be sought’. WPD believes that minor re-drafting in these areas may be appropriate.



P2/6 Definitions

WPD believes that the definitions of Group Demand and Transfer Capacity provided in Section 3 of ER P2/6 are adequate. The Circuit Capacity definition in ERP2/6 does make reference to the use of appropriate seasonal ratings. However, some re-drafting to allow for networks which peak during summer periods could be considered, although this may necessitate the consideration/development of methods for weather correcting demands during other seasons of the years, such as summer.

P2/6 Embedded Generation

WPD has not had any significant experience of an area where embedded generation is contributing to security supply to maintain it within the ER P2/6 standard.

Second Circuit Outage (SCO) Events

WPD is aware that there is increasing awareness within the industry of the impact of SCO events, being driven by the possibility of extended periods of time (weeks rather than days) where some proportion of demand could not be restored. These could clearly have a high profile publicity impact for the company, and also potentially incur significant financial penalty in terms of incentive schemes and guaranteed standards of service payments to customers. These correctly provide incentives to minimise impact of such events, although ER P2/6 design standard only requires restoration within 'time to restore arranged outage'. WPD would welcome wider debate on such issues, and this area overlaps significantly with discussions on high impact low probability events, and common mode failure issues. WPD recognises that ER P2/6 is a minimum standard and the Distribution Network Operator could and on occasions do go beyond this. We believe that it would be helpful to develop a framework that justifies expenditure beyond P2/6 for specific situations.

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager