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**Modification of electricity transmission standard licence conditions – way forward
February 2008**

Dear Graham,

We welcome the opportunity to comment on the document. This response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Trading GmbH and RWE Innogy.

We endorse the general approach outlined and agree that the scope of any amendments should be limited to those required to accommodate offshore electricity transmission and to enable the GBSO to operate offshore as well as onshore. Although a single electricity transmission licence with various Sections switched on or off depending on the licensee may be slightly cumbersome, for ease of reference it is probably better than having multiple licences. As there are expected to be new entrant offshore transmission owners (OFTO) the obligations on the licensees as set out principally in the new Section E need to be clear.

The document sets out a framework for amendment of the transmission licence, but we note that the licence is one element of the overall framework. There is a clear interdependence between SLCs in the transmission licence, the powers being taken under the Energy Bill and industry codes. Although the high level policy has been decided, as the details are developed in the working groups there may be a requirement for consequential amendments. For effective consultation, it is vital that the various documents are available together so that the industry can undertake a meaningful and informed review and ensure consistency between all elements of the new regulatory arrangements for offshore electricity transmission.

We hope these views are helpful and if you wish to discuss them further please contact me on 01793 893983.

Yours sincerely,

Charles Ruffell
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