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Dear Richard

Thank you for the opportunity to comment on the Draft Tender Regulations for Offshore Electricity Transmission. This response is made on behalf of National Grid Electricity Transmission plc (NGET).

As you point out, the tender regulations are intended to set out in a transparent way the framework for the tender process and therefore they need to reflect a number of the key decisions that have already been made during the development of the offshore electricity transmission regime. At a general level, we agree that the draft regulations as proposed achieve this aim.

NGET, acting in its capacity as the GB System Operator (GBSO), will be required to interact with the offshore tender process via the provision of data to inform potential bidders, and by responding to issues as and when they arise within the process. It is our view that further discussions are required to develop the detailed processes that will be followed during the tender process along with the roles and responsibilities of the various stakeholders within it. We look forward to further discussions with Ofgem on this issue.

We have some detailed comments on the document as follows:

- 1) The term 'GBSO' is defined in Part 1. GBSO is then used in the context of 'a developer.....entered into a CUSC bilateral connection agreement with the GBSO'. We believe it would be appropriate for the term GBSO to be replaced with NGET, as it is the legal entity NGET that is the contractual counterparty with users.
- 2) In a number of places in the draft tender regulations, the term 'CUSC bilateral connection offer' is used. This should be replaced by 'CUSC bilateral connection agreement'.

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- 3) More generally, it will be necessary to ensure that the tender regulations are robust to the possibility that a potential OFTO 'bundles up' its response to more than one tender to provide a co-ordinated solution to connect more than one offshore generator.

Please contact me if you require further information.

Yours sincerely,

Chris Bennett
Future Transmission Networks Manager