

Lesley Nugent  
Office of Gas and Electricity Markets  
70 West Regent Street  
Glasgow  
G2 2QZ

Your ref  
Our ref  
Name Charles Ruffell  
Phone 01793 89 39 83  
Fax 01793 89 29 81  
E-Mail charles.ruffell@rwenpower.com

18<sup>th</sup> November, 2008

**Derogation requests to facilitate earlier connection of generation – consultation on information required to facilitate Ofgem’s assessment and proposed amendments to guidance  
October 2008**

Dear Lesley,

We welcome the opportunity to respond to this Open Letter. This response is provided on behalf of the RWE group of companies, including RWE npower, RWE Supply and Trading GmbH and npower renewables, a fully owned subsidiary of RWE Innogy.

We agree that time-limited GBSQSS derogations have the potential to accelerate connection of those renewable generators that currently have planning consents. However, we also believe that Ofgem needs to be satisfied that the early connection of this generation can be objectively justified and a positive cost benefit demonstrated. Appendix 1 appears to include the information for this assessment to be undertaken.

It is reasonable to provide guidance to National Grid, as GB System Operator, as it identifies opportunities to use derogations from minimum standards in the GBSQSS. It will be important for the GBSO to understand what is required in requesting a derogation and also for developers to know that there is an established process in place for gaining a derogation to achieve earlier connection of projects.

The basis of each derogation Application needs to be transparent. In particular, its needs to be clear whether the application is principally to, for example, avoid the cost of a double circuit or whether it is principally to benefit the developer. Correctly establishing the reason for the application is important in relation to establishing grounds for compensation and/or ensuring National Grid commit to providing a fully compliant connection once they are able to do so.

We hope these views are helpful and would be happy to discuss them further.

Yours sincerely,

Charles Ruffell  
Economic Regulation

RWE npower

Trigonos  
Windmill Hill Business  
Park  
Whitehill Way  
Swindon  
Wiltshire SN5 6PB

T +44(0)1793/89 39 83  
F +44(0)1793/89 29 81  
I www.rwenpower.com

Registered office:  
RWE Npower plc  
Windmill Hill Business  
Park  
Whitehill Way  
Swindon  
Wiltshire SN5 6PB

Registered in England  
and Wales no. 3892782

