

Anthony Mungall
Transmission Directorate
Networks
Ofgem
70 West Regent Street
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5 December 2008

Dear Anthony,

British Energy response to the impact assessment and consultation document for 'Charging arrangements for transmission infrastructure assets local to generation connections'

The British Energy group of companies welcomes the opportunity to respond to the above consultation. Our comments relating to some of the issues raised in the impact assessment are set out below.

We note that this change is being introduced to provide generation users with a more cost reflective signal to enable efficient choice of connection design. British Energy believes that the SQSS should continue to be the determining factor (noting the potential for temporary derogations and the current Fundamental Review) in providing generator connections and that the charging for design variation connections should not therefore have any impact on security of supply.


We support the view that more cost reflective local charges might be considered to promote competition and as this modification is led by issues associated with generation connections we agree that the differential treatment of demand can be considered non-discriminatory.

We note that this modification will act as an enabling factor for the CUSC amendments considered within the transmission access review (TAR) and that the Authority's decision should not be dependent on the TAR progress.

British Energy believes that the stability and transparency of charging methodologies is extremely important when considering charging modifications and supported this option presented in National Grid's GB ECM consultation as it provided a better balance of appropriate price signals and complexity than the alternative.

Please contact me directly should you need clarification on any of these points.

Yours sincerely



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