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Dear Stuart,

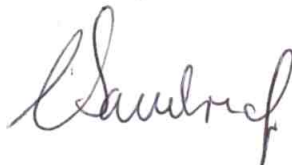
Derogation requests to facilitate earlier connection of generation – consultation on information required to facilitate Ofgem's assessment and proposed amendments to guidance

We welcome the opportunity to respond to the open letter on Ofgem's proposals on the information you require to inform your assessment of derogation requests from transmission licensees. Such requests include requests for derogation from the obligation for transmission licensees to comply with the GB Security and Quality of Supply Standard ('GB SQSS'). National Grid is also of the view that GB SQSS derogations could facilitate the earlier connection of certain new generation and therefore believes it is helpful for Ofgem to propose a revised guidance to electricity licensees more generally, in respect of requests for derogation from licence obligations to comply with certain technical codes and/or standards.

As you are aware National Grid as the GBSO and the transmission licensees are reviewing the possibilities for earlier connections for developers that can move their connection dates forward via the GB Queue Methodology¹. It is envisaged that when all available capacity is utilised through the availability of boundary capacity an interim connect and manage process requiring derogations could be used to connect further MWs onto the system. Where the transmission licensees have identified a potential case for a derogation, we believe the details set out in appendix 1 to your to be most helpful.

Our responses to the specific questions raised in the Consultation Document are attached below.

Yours sincerely,



Duncan Burt



National Grid's responses to the specific questions within the open letter are as follows:

Question 1 – Do you consider the information that we would expect to be provided in requests for derogations to facilitate earlier connection of new generation to be appropriate? If not, what additional information should be sought?

We believe the information expected to be provided is appropriate for derogations to facilitate earlier connection of new generation. In respect of such a derogation in Scotland it will be incumbent on the relevant TO to provide information on the capability of the system and the specific obligations in the GB SQSS that the licensee would not comply with and for the GBSO to provide analysis on the costs of constraints.

Question 2 – Do you have any comments on our proposal to include the STC as one of the codes to which the derogation guidance applies?

We agree with Ofgem that it is appropriate to include the STC as one of the codes applicable to the derogation guidance.

Question 3 – We would welcome views on whether it is appropriate for the same guidance to continue to apply to derogations from P2/6 as it does to other derogation requests.

We do not believe that this item is relevant to National Grid.

Question 4 - We are interested in views on what circumstances could be considered for such "self certification" by the DNOs against P2/6 and how, in these cases, the Authority could be satisfied that it remains in a position to fulfil its statutory obligations, in particular in respect of security of supply.

We do not believe that this item is relevant to National Grid.