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Our ref

Your ref

Date

18 November 2008

Dear Lesley

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

Thank you for the opportunity to respond to Ofgem’s consultation on derogation requests. This response is from both Western Power Distribution (South West) and Western Power Distribution (South Wales).

We recognise that it is appropriate for Ofgem to consider the broader aspects of environmental and sustainability issues within a derogation assessment.

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?

Yes we agree that the information requirements detailed in the Open Letter is appropriate.

• 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 have no comments to make on this question.

• 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.

Yes it does appear to be appropriate for the same guidance to apply to derogations to P2/6.



• 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.

In our experience the introduction of the self-certified derogation in March 2007 for groups less than 60MW, has worked well.

Therefore if Ofgem considered it appropriate we would support the extension of self-certification to the 60-100MW group. We do not believe that there would be a significant impact on WPD as there are only a relatively small number of load groups of this size in our area.

With regard to the proposed Annual Compliance Report, DNOs already publish demand and capacity data within their Long Term Development Statements (LTDS), and there are tables within the annual Cost Reporting Return (RRP) which analyse system utilisation and substations beyond an 80% loading level. We would suggest any annual compliance requirement should take account of these reports, and be limited to those circumstances where a self certified derogation has been applied since those parts of our network approaching compliance limits are visible through the LTDS and RRP.

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory and Government Affairs Manager