

Yvonne Norton
Ofgem
Cornerstone
107 West Regent Street
Glasgow
G2 2BA

Kristina Dahlstrom
Department of Energy and Climate Change
4th Floor, area D
3 Whitehall place
London
SW1A 2AW

Mark Ripley
Regulatory Frameworks Manager

Mark.g.ripley@uk.ngrid.com
Direct tel +44 (0)1926 65 4928
Direct fax +44 (0)1926 656605
Mobile +44 (0)7768 106952

www.nationalgrid.com

29 November 2010

Dear Yvonne / Kristina

Offshore Electricity Transmission: Implementing further refinements to the enduring regime

National Grid owns and operates the high voltage electricity transmission system in England and Wales and, as National Electricity Transmission System Operator (NETSO), we operate the Scottish high voltage transmission system. Following Go Active on 24 June 2009, the scope of our system operator role was extended to offshore waters.

As highlighted in the consultation we have helped draft the changes to the CUSC, Grid Code and STC to facilitate the generator build option, as such we have not responded to the specific questions on the proposed changes to industry codes. The timescale for the delivery of this drafting has been extremely challenging. Whilst we feel the drafting achieves the policy intent it is likely, if implemented in the proposed timescales, that some further development will be necessary with the industry. For example, it may be helpful to develop template options for the possible scopes of Offshore Transmission System Development User Works (OTSDUW), such that it is more straight forward for all parties for defined stages. Such development can be done using the normal standing groups available under the existing code governance rules. National Grid would be happy to lead on such development.

We welcome the commitment you have made to undertake further work to consider the measures required to deliver a coordinated approach to the development of the onshore and offshore transmission network. We would like to reiterate in this response that if we are to maximise the benefits of coordination it is essential that early progress is made to deliver an integrated solution and developments in the interim must not inhibit the future implementation of such a solution. We look forward to working with you to progress this over the coming months.

Finally, we have previously raised concerns associated with the EU 3rd package of energy legislation. In particular, we have misgivings on how the third package is being interpreted to allow generators a role in developing transmission infrastructure, e.g. in relation to the coordinated development requirements of Article 12 (e).

If you wish to discuss further please do not hesitate to contact me or David Smith on 01926 655534.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Mark Ripley', written in a cursive style.

Mark Ripley
Regulatory Frameworks Manager