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Chapter 2

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| 1 | Have we correctly identified the GB TSOs that require certification? Are there other TSOs that would require certification? - |
| 2 | Are there reasons why the subsidiaries of National Grid plc that act as TSOs should not be certified according to the OU model? What are these? - |
| 3 | What do you think of our proposed approach to certifying the various interconnectors? |

As BBL Company is in the possession of a regulatory exemption Ofgem does not see the necessity to certify BBL. We support this approach and kindly ask Ofgem to provide for this in the respective legislation or in the licence regime with a clarification which reflects the roll-over of existing exemptions into exemptions from ownership unbundling. To create certainty on the side of the relevant interconnector, it should also be made clear in the legislation or licence regime that an exemption can only meaningfully apply to the whole of the infrastructure.

As BBL Company does not need to be certified it is necessary to ensure that BBL Company is still considered the operator of the pipeline and will be approved and designated as such by the Member States involved.

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| 4 | Do you agree that OFTOs should require certification with respect to the unbundling provisions and be obliged to comply with the ownership unbundling model (with possible exceptions noted below)? - |
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Chapter 3

5	Do you consider that the arrangements relating to the Scottish electricity transmission companies guarantee more effective independence of such licensees from the vertically integrated undertakings of which they are part of than the provisions of the ITO model? Why? -
6	Are there further areas of investigation or clarification we could consider? -
7	Do you consider our overall approach to the assessment of the Scottish electricity transmission companies against the Article 9(9) derogation appropriate? -