

22nd September 2011

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Dear Sheona

NETS SQSS GSR009 consultation

The Renewable Energy Association is pleased to respond to this consultation on adapting the SQSS to be appropriate for a transmission system to which a significant amount of intermittent generation may be connected. Our members work on all types of renewable power and heat projects including all types of renewable electricity generation projects. These range from the smallest domestic systems to transmission connected projects of several hundred MW. The types of generation cover the full range from intermittent through controllable but energy limited to base load.

We are pleased that this proposal is at last in sight of possible adoption having supported a dual criterion approach for at least the last three years. Whilst we do not agree with the pseudo cost benefit part of the standard being adopted rather than a full cost benefit approach in practice this may be rather academic if full cost benefit analysis is in fact undertaken for major reinforcement projects.

In other words we think that it would have been better if the use of a cost benefit approach was mandated in the standard, with the pseudo cost benefit approximation used as an initial approximation of the required capacity rather than making the pseudo cost benefit analysis the standard and performing a full cost benefit analysis as a process completely outside the standard. The latter devalues the status of the SQSS as it ceases to be the definitive guide on how much transmission capacity is required.

Turning now to your specific questions:

CHAPTER: Three

Question 1: Do respondents support the proposed dual criteria approach?

We have been supporters of a dual criteria approach since 2008.

CHAPTER: Four

Question 1: Do respondents consider that we have identified, and where appropriate, quantified the impacts of the GSR009 proposal?

A primary impact, which is only referred to in passing but should be given more prominence up front, is that compared to the current standard which would provide inadequate security for an importing area with a lot of predominantly intermittent generation, the proposed standard would ensure sufficient transmission to secure demand in such areas under low intermittent generation conditions.

Question 2: Do respondents consider that there are any additional impacts that we have not fully considered?

No

Question 3: Do respondents wish to present any additional analysis that they consider would be relevant to our assessment of the GSR009 proposal?

No

We hope that you find these brief comments useful. Please let me know if you would like to discuss them further.

Yours sincerely

Gaynor Hartnell

Chief Executive, Renewable Energy Association