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24th May 2012

Dear Sheona

**National Electricity Transmission Security and Quality of Supply Standard (NETS SQSS):
proposed modification (GSR008)**

Thank you for the opportunity to respond to the above consultation, issued on 10th May 2012. This response is provided on behalf of National Grid Electricity Transmission plc (NGET). NGET owns the electricity transmission system in England and Wales and is the National Electricity Transmission System Operator.

We agree with your view that the GSR008 proposals of the NETS SQSS Review Group should not be classed as 'important' under the Utilities Act 2000, and that an impact assessment is not warranted. The changes are primarily concerned with improving clarity of the NETS SQSS and bringing greater consistency with other industry documents. We do not envisage that the proposals will significantly impact investment in the transmission system, the costs of operating the system, or existing levels of security. However, in view of the large number of changes to the NETS SQSS text that are proposed, it is appropriate that interested parties are given further opportunity to comment, in addition to the consultations already undertaken by the Review Group. NGET would support the inclusion of suggested text modifications where these aid understanding and / or clarity without materially changing the intent of the wording. The summary table that you have included in the consultation will be very helpful in aiding understanding of the proposals and encouraging responses.

We agree with your assessment of the proposals against the relevant principles of the Review Group. The clarity and consistency that the proposals seek should better facilitate co-ordinated and consistent system planning, and consequently efficient and economic system development and operation. We do not anticipate any impact on the security and quality of supply, or on the safe operation, of the system. Nor do we expect there to be any impact on effective competition within electricity generation and supply, or on the EU obligations of the Transmission Licensees.

We support all of the GSR008 proposals to amend the National Electricity Transmission System Security and Quality of Supply Standard. In our view the proposals address a number of areas of inconsistency and provide greater clarity within the standard, aiding transparency of system planning and operation. The draft NETS SQSS text fully addresses all of the proposals that have been made.

If you would like to discuss any of these points further, please do not hesitate to contact me, or Mark Perry (phone 01926 655468).

Yours sincerely

[By e-mail]

Paul Whittaker
UK Director of Regulation

c.c. David Wright, NETS SQSS Review Group Chair