

# RWE npower renewables

Anthony Mungall,  
Ofgem,  
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(Submitted electronically)

Your ref 101/12

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## **RWE Group Response: on extending the discount for small transmission connected generators**

Dear Anthony,

We welcome the opportunity to respond to this consultation regarding the discount for sub 100MW generators connected at 132kV in Scotland and in offshore waters.

This response is provided on behalf of the RWE group of companies, including RWE npower plc, RWE Supply and Trading GmbH and RWE npower renewables Limited, a fully owned subsidiary of RWE Innogy GmbH.

We support Ofgem's proposal (a)i.) to extend the expiry date of the licence condition to 31<sup>st</sup> March 2016, and continue to set the small generator discount at 25% of the total residual TNUoS tariff. While transmission is defined in a different way in Scotland compared to the rest of the UK this problem will persist.

We are disappointed that the enduring regime for small transmission connected generators has not yet been established and urgently seek a long term solution. SLC C13 should be removed once an acceptable solution is established and industry is given sufficient lead time to adopt changes.

For now the discrimination identified in the implementation of BETTA persists and the rationale for the discount still stands.

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