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Repsol Nuevas Energias – Response to OfGEM e-serve consultation on implementation of the generator commissioning clause in the Energy Bill.

Dear Sir/Madam,

With regards to the request for feedback on the consultation around Introduction of the Generator Commissioning Clause in the Energy Bill, please see below and attached Repsol Nuevas Energias comments.

Repsol Nuevas Energias (RNE) are an offshore wind farm developer with a key shareholding in three offshore wind farms in Scotland. These consist of two Scottish Territorial Water developments at Beatrice Offshore Windfarm and Inch Cape Offshore Windfarm each with 1000MW and 1050MW of grid connection offers respectively and one UK round 3 development at Moray Offshore Windfarm which holds 1500MW of grid connections. Please note that the following views are that of Repsol Nuevas Energias and do not necessarily represent the views of our project partners or of the project entities themselves.

In general it is the view of RNE that the introduction of this clause is necessary in order to address the obvious issues around generator build commissioning. RNE is broadly in agreement with the methodology and approach adopted in this clause but has some key concerns and points that it wishes to raise in the response. These comments are included in the attached appendix.

Should you have any questions regarding this feedback, please contact Hugh Morgan or Stephen Kerr on 0131 557 7101.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Hugh Morgan", with a long, sweeping underline.

Hugh Morgan

On behalf of Repsol Nuevas Energias

APPENDIX – Repsol Comments on consultation for implementation of generator commissioning clause in UK Energy Bill

COMMISSIONING PERIOD

RNE has concerns that the 18 month period stipulated in this process is based on an arbitrary period that is, at best, an estimation based on previous projects undertaken by developers. This date was provided to OfGEM by developers as a guide rather than a maximum time required for completion of this process. It is RNE's view that this period may not be sufficient to carry out all the required commissioning for the next generation of wind farms, specifically for those projects that have an extended set of requirements for commissioning due to the added complexity of the transmission system design. HVDC connected systems, for example, are likely to take longer to commission than that of early AC transmission systems and as such RNE believes that to put an arbitrary period of 18 months into the process does not provide any added value. It is therefore RNE's opinion that the commissioning period be defined as "within a period that is reasonably practicable" or at the least is adjusted to hold a period of time that makes allowance for the added complexity of these future projects. A minimum of 24 months would be a better period than the suggested 18 months for example.

TRIGGER POINT AT ION B ALLOCATION

Given the options considered, RNE agrees with OfGEM's view that ION B provides a sensible point at which to allocate the trigger point, however RNE is concerned that while assessing these options and the general process for commissioning, due consideration has not been taken of the interactions between wind farm commissioning and OTSUA commissioning. It is noted that in general OFGEM would like to decouple these two processes however for AC connected generation designs in particular there is the possibility of using the wind turbine generators to offset some of the charging current requirements of the OTSUA. Such designs would need to be agreed in the System Capability Statement and bilateral grid connection agreements however if such an option were to be implemented then there would be an interface between turbine commissioning and OTSUA. This has implications on the lifting of the 20% limit and on the point at which the transmission system can be deemed to be capable of exporting real power for the purposes of electricity transmission. If as stated in the consultation paper the Wind Farm cannot receive an ION B prior to the OTSUA ION B issuance then such a design could not be realised. For this reason RNE feels that the OTSUA commissioning process should not be decoupled from that of the wind farm but should consider both processes in parallel in order to assure that there are no design limitations imposed on the power system which could result in a less economically efficient transmission design or cause any undue delay or inefficient approach to the commissioning process.

IMPLICATIONS OF P294

RNE is in agreement with the proposed changes to the BSC and would agree that OFGEM should consider what changes would be required to this code in order to implement this clause. It is RNE's view that modification of the definition of Transmission System to include high voltage assets that are expected to become Transmission System following OFTO transfer would help to address this issue. It again does not appear to be efficient to introduce further complexity and cost by designing multiple metering points.



PHASED AND STAGED APPROACH

Although RNE do not believe it is the intention of the consultation, the wording in the document to date could be construed as limiting the capability of the wind farm to energise and carry out voltage control commissioning prior to the completion of the transmission works. For the avoidance of doubt it is RNE's understanding that although a completion notice may be 'agreed' or 'granted' for each stage it would only be 'issued' on completion of each phase. If this is not the case then the wind farm commissioning would require issuance of the OTSUA completion notice after the first export cable is installed which would then trigger transmission system classification for all work in that phase and restrict commissioning of the remaining high voltage cables as well as restrict the OFTO transfer process. Alternatively it could be read that the wind farm would be constrained by the installation program for the OTSUA which would result in a delay of 3 years or more under an AC design if all cables in a phase had to be commissioned before a wind farm ION B could be granted. RNE would request that OFGEM clarify this part of the process and again request that this process is considered in parallel with that of the wind farm commissioning and OFTO transfer process to assure a joined up approach is taken.

RNE also feel that further clarification is required on the definitions of phased and staged. For example some stages may be separated by a number of years due to supplier constraints however investment decision and design assumptions would be taken within the same timescales. Similarly it is not clear in this consultation how the commissioning process would be implemented in the case where two stages with possibly two different OFTOs share a phase with a planned backfeed or interconnection. As above RNE feels it is important to ensure that introduction of a clear commissioning process does not unintentionally limit any design options or affect the economic efficiency of the overall design.

IN FLIGHT PROJECTS

As RNE do not have any in flight projects, there are no comments on this area of the Clause implementation.

