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24 February 2014

Dear Catherine

## **OFFSHORE ELECTRICITY TRANSMISSION: CONSULTATION ON IMPLEMENTATION OF THE GENERATOR COMMISSIONING CLAUSE IN THE ENERGY ACT 2013**

National Grid Electricity Transmission plc (NGET) welcomes the opportunity to respond to the above Consultation. Under its Transmission Licence NGET has responsibilities as both the National Electricity Transmission System Operator (NETSO) for GB and as the transmission owner (TO) onshore in England and Wales. This response is on behalf of NGET plc and is not confidential.

As NETSO we have a crucial role in providing the interface between offshore transmission owners (OFTOs), onshore TOs and offshore generators. We are also affected, as the TO in England and Wales, by the offshore transmission networks developed under the OFTO regime that interface with our transmission system. We have provided a specific response in relation to one question raised in the consultation document, and this is detailed in the Appendix to this letter. In all other areas, we are in agreement with the positions reached to date and we consider that these best meet the requirements of the Generator Commissioning Clause.

NGET has supported Ofgem in the development of the proposals set out in this consultation, and acknowledge that projects with co-ordinated network development may need further consideration. Where future projects have a co-ordinated approach, we will work with Ofgem and wider market participants to consider whether any adjustments to the completion notice trigger point are necessary.

If you would like to discuss any of the points we have raised or have any questions regarding them, then in the first instance please contact Jackie Mesnard ([jackie.mesnard@uk.ngrid.com](mailto:jackie.mesnard@uk.ngrid.com) or 01926 656297).

Yours Sincerely,

**MATT GOLDING**  
**Head of Commercial Frameworks - Electricity**

**FOR AND ON BEHALF OF**  
**NATIONAL GRID ELECTRICITY TRANSMISSION PLC**

## **APPENDIX 1**

### **CHAPTER 4**

***Question 4.1: We invite comments on all aspects of the proposed drafting provided in Annex 1. In particular, do you agree that the proposed transmission licence modifications adequately implement the provisions in the Clause and our proposals set out in this document? Please provide reasons to support your answer.***

We would propose that the definition of "Completion Notice" is introduced by making it paragraph 12 and stating:

In this condition, "Completion Notice" means a notice given by the licensee to the Authority in relation to an offshore transmission system stating that it would be possible to carry on an activity to which section 4(1)(b) of the Act applies by making available for use that system.