

Email received on 1 July 2014 at 16:23

Sujitra

I am writing in response to the above consultation on behalf of National Grid Electricity Transmission plc. We have no substantive issues but would point out the following two typographical issues in relation to the proposed licence modification set out in Annex 1 to the Notice given under section 11A(2) of the Electricity Act 1989 and dated 13 June 2014.

In Special Condition 4A, in Part B the paragraphs numbered 4A.1 and 4A.2 should refer to 4A.3 and 4A.4 as these are the relevant provisions that are being amended. This appears to be a simple formatting issue in the consultation drafting.

In Special Condition 4A, in paragraph 4A.1 (to be renumbered 4A.3), to the right of the “=” sign whilst all the “t” terms (at the end of algebraic terms) should be subscript, the terms themselves, the + and x operators and brackets should be normal font and not subscript as currently written.

On a related point, we would also raise an issue in relation to paragraph 4A.7. Whilst this paragraph is not being modified as part of this consultation, it was modified by a direction dated 9 May 2014 in relation to NGET’s EMR preparatory costs. The 9 May direction included a new definition of “SOEMRCO_{t,2}” in special condition 4A.7 which included the words “the licensee’s actual incremental and efficiently incurred internal costs incurred associated with preparing for the performance of EMR Functions”. The underlined word “incurred” is superfluous and inconsistent with the formulation of SOEMRCO_t in special condition 4A.4 with the result that it should be removed. We did raise this point in our response to the statutory consultation but this was not addressed. As special condition 4A is now being amended again, this may provide an opportune moment to address this minor drafting issue.

Please do contact me if you wish to discuss any of these points.

Regards

Jon

Jonathan Munsey
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA