

Our Ref: DT/RD

19 May 2014

Catherine Williams
Head of Commercial Regulation
Electricity Transmission
Ofgem
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BY EMAIL & POST
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Dear Catherine

PROJECT TRANSMIT: FURTHER CONSULTATION ON PROPOSALS TO CHANGE THE ELECTRICITY TRANSMISSION CHARGING METHODOLOGY

Response on behalf of Banks Renewables Ltd

As a developer of onshore wind generation, including a number of sites that will be connected to the transmission network, Banks Renewables have an interest in the proposals to change the electricity transmission charging methodology.

Question 1: Do you agree with our interpretation of benefits to consumers of implementing WACM 2, including the revised impact assessment modelling?

We agree that implementing WACM 2 would lead to a more cost reflective method of charging based on how the transmission system is designed, which in turn would benefit consumers in the long term.

Question 2: Do you agree that the revised impact assessment modelling captures concerns raised during the August 2013 consultation about the NGET modelling?

We are unable to comment in detail on this question.

Question 3: Do you agree with our minded-to position in light of new evidence discussed below and the responses to the consultation set out in Appendix 2?

Following a review of the consultation documentation we agree with Ofgem's minded-to position. Implementation of WACM 2 will be an improvement on the status quo as it will lead to a more cost reflective method of charging based on how the transmission system is designed.

Question 4: Do you agree with our minded-to position to implement in April 2016?

Yes, we agree. April 2016 should be the latest date that this change is implemented.



Thank you for the opportunity to comment on these proposals.

Yours sincerely



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