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Consultation on proposals to modify Standard Licence Conditions 14 and 15 of the electricity generation licence

Dear Anthony,

Thank you for the opportunity to respond to this consultation. This response is provided on behalf of RWE Innogy UK.

As referenced in the consultation, the existing drafting of the Licence Condition prevented Triton Knoll Offshore Wind Farm Limited (hereafter "TKOWF") from exercising its power of entry for survey purposes because the power of entry in standard condition 15(4), pursuant to paragraph 10 of schedule 4 to the Electricity Act 1989, was interpreted as applying only for establishing whether the land was suitable for the "construction or extension of generating station". The Authority's "minded-to" decision to refuse TKOWF entry applied a legitimate but restrictive interpretation of SLC 15. This decision could have potentially delayed the development of Triton Knoll Offshore Wind Farm - one of the United Kingdom's largest offshore wind farms.

We are therefore pleased to see Ofgem address this issue and are fully supportive of the changes proposed in this consultation. These modifications to extend the condition to ensure it covers associated activities in connection with the construction or extension of a generating station should prevent future developers from running into the same issue as TKOWF. Furthermore, in addition to addressing the issue which impacted TKOWF, we note Ofgem have completed a general review of SLC 14 and 15. We further support these changes as helpful clarifications which remove duplication and tidy up the overall drafting of the document.

In conclusion we are fully supportive of the changes proposed in this consultation and support Ofgem in their intention to modify the electricity generation licence to implement these changes.

Please do not hesitate to contact myself should you have any questions.

Yours sincerely,

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