

Fred.Olsen Renewables Ltd 64-65 Vincent Square London SW1P 2NU

20th February 2017

Marta Csirinyi
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Dear Marta,

## Re. Statutory consultation on a proposal to modify the standard condition of all electricity generation licences

Fred.Olsen Renewables (FOR) is a wholly owned subsidiary of Bonheur ASA and is responsible for the group's renewable energy activities. FOR's main focus is onshore wind power and the first investment was made back in 1996. The main office is based in Oslo and the activities are focused on the Scandinavian market and the UK. Significant efforts have been made in developing green field projects. This has proven particularly successful in the UK (under Fred.Olsen Renewables Ltd – FORL) and the company's first large scale wind farm, Crystal Rig, commenced operation in 2003. Since then, six additional wind farms have been constructed in Scotland, one under construction in Scotland, one in Norway and one in Sweden, which brings FOR's total installed capacity up to 595.8 MW.

We wish to raise two points in relation to your consultation:-

- 1. You use the terms 'excessive' & 'excessively' but fail to define these terms.
- 2. With regards to BM participation a generator does not know if it being curtailed due to a constraint on the system or due to balancing when it is instructed through the BM. In this instance how would a developer know that they were in a transmission constraint period?

We are happy to engage further should you have questions or require clarifications.

Yours sincerely,

Graeme Cooper
Executive Director

Fred. Olsen Renewables Ltd

cc. Gareth Swales Commercial Director Fred. Olsen Renewables