

Alastair Lamond Commercial Manager InterGen UK 81 George St, Edinburgh EH2 3ES

Emily Sam Ofgem 9 Millbank London SW1P 3Ge

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Dear Emily,

Consultation on removing references to Supplemental Balancing Reserve and Demand Side Balancing Reserve from National Grid Electricity Transmission plc ('NGET') licence

Background

InterGen remains the only genuinely independent generator active in the GB market with a track record of developing, constructing and operating large scale thermal power generation projects. We have been active in the market since the 1990s and therefore bring a unique perspective to the debate on energy matters in GB. InterGen is owned by two major international investors, representing two key classes of investment which the Government is seeking to attract to UK infrastructure investment, namely, pension funds (Ontario Teachers' Pension Plan) and strategic investors from the People's Republic of China (China Huaneng/Yudean).

InterGen is one of the UK's largest independent generators, operating a portfolio of three flexible gasfired power stations totalling 2,490MW; an investment of some £2.1bn. These stations are located at Rocksavage (Cheshire), Spalding (Lincolnshire) and Coryton (Essex). Additionally, in December 2016, at the T-4 auction, InterGen won a fifteen-year capacity market agreement to construct a 300MW OCGT, an expansion of the existing Spalding site. InterGen is also ready to build new H-class CCGT projects at sites in Spalding (Spalding Energy Expansion) and Essex (Gateway Energy). The new CCGT stations, which are shovel-ready, will cost around £800million to construct and create around 3,000 jobs over their three year build programmes.

Response

InterGen welcomes the opportunity to respond to the consultation on removing references to Supplemental Balancing Reserve (SBR) and Demand Side Balancing Reserve (DSBR) from National Grid Electricity Transmission plc ('NGET') licence. We support Ofgem's proposed approach and minded to position, as outlined in the consultation letter and accompanying document, to remove SBR and DSBR

references from NGET's licence. We believe that the decision will allow the Capacity Market to better deliver its intended benefits, that is, to secure generation capacity economically and efficiently.

Please do not hesitate to get in touch if you have any questions or would like further discussion on any of the points raised above.

Yours sincerely,

AChamond

Alastair Lamond Commercial Manager InterGen UK