

Our Ref: DSCT/JDE BRL/ADM/COR

20 December 2018

Andrew Self
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BY EMAIL:
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Dear Andrew

STATUTORY CONSULTATION ON OFGEM PROPOSAL TO MODIFY STANDARD LICENCE CONDITION C13 (ADJUSTMENT TO USE OF SYSTEM CHARGES (SMALL GENERATORS)) OF THE ELECTRICITY TRANSMISSION LICENCE

Thank you for the opportunity to respond to your consultation on extending the small generators discount for transmission connected generation at 132kV in Scotland.

Banks Renewables are a developer, owner and operator of renewable generation. We are presently constructing two transmission connected wind farms in Southern Scotland and will shortly have over 223 MW of connected generation capacity in Yorkshire, Northern England and Southern Scotland.

We support your proposal to amend the expiry date of the small generators discount until 31 March 2021.

In our view the small generators discount should remain in place until the level playing field for small 132kV connected generators in Scotland exists. To remove the distortion, that the small generators discount was designed to offset, a revised enduring charging regime that takes account of the differences in voltage boundaries and connection charging between England and Scotland will be required. Therefore a fixed end date for the small generators discount may not be applicable at this point.

Yours sincerely



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