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Drax Power Limited
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Dear Marion Quinn,

Re: Code Governance Review (Phase 3) Final Proposals: Consultation on Licence Modifications

Drax Power Limited (“Drax”) is the operating subsidiary of Drax Group plc and the owner and operator of Drax Power Station in North Yorkshire. The 4,000MW station consists of six separate units which together produce around 7-8% of UK generation. Until recently, these units all ran (mainly) on coal. However, two of these units have been converted to renewable biomass (in 2013, and 2014 respectively), and a third unit is expected to convert in 2016, at which point Drax will be a predominantly renewable generator, and have completed the largest decarbonisation project in the EU. Haven Power Limited (“Haven”) is an electricity retailer and a subsidiary of Drax. Haven supplies small and medium (SME) sized business customers and larger Industrial and Commercial (I&C) customers. This response represents the views of both Drax and Haven.

Drax welcomes the opportunity to respond to this consultation. Below we draw attention to the main points we would like Ofgem to consider in response to its initial proposals.

Appendix 02, Appendix 04, and Appendix 09 (paragraphs 4G, 6G, and 4F respectively) allows for the Authority to withdraw the proposal and any alternatives if certain conditions allow. Standard Code Modification procedures in the Connections Use of System Code (CUSC) and the Balancing and Settlement Code (BSC) allow a relevant party to the Code to take ownership of the modification if the original party withdraws their support. However, it is unclear in the Code Governance Review (Phase 3): Final Proposals document if this would be the case if Ofgem were the original party. Drax encourages Ofgem to provide guidance on this issue before the final decision is made. We believe that the right should be retained for industry parties to take ownership of a modification if Ofgem withdraws its support.

Should you have any questions or wish to discuss this response, please feel free to contact me (email: Joseph.Underwood@drax.com; telephone: 01757 612 736).

Yours sincerely,

Submitted by email

Joseph Underwood
Industry Codes Analyst