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Thursday 26 November 2009

Re: Consultation on NGET's request for Grid Code and STC derogations in respect of certain offshore 'transitional projects' - ref:131/09

Dear Stuart,

We are grateful that Ofgem has undertaken this consultation and welcome the opportunity to respond. Our response is on behalf of E.ON Climate and Renewables UK Robin Rigg East Limited and E.ON Climate and Renewables UK Robin Rigg West Limited.

As first round transitional projects these two windfarms have been designed to meet the distribution system requirements which they are presently connected to. From Go Live the interface point will change and become an offshore embedded transmission connection. Consequently the two windfarms do not have the capabilities to meet the transmission requirements for which the derogations have been sought. We therefore agree with the derogations listed in tables one through to four.

We are currently discussing the capability of the windfarms to meet the NETSO's requirements at Go Live. As part of these discussions we are explaining the limited capability of the windfarms to provide the NETSO with the data and signals it has requested. Whilst those discussions are ongoing and not yet resolved, we continue to be of the view that the two windfarms will not be able to meet the requirements of CC6.5 and 6.6.

It may only be possible to provide the signals requested from the onshore substation, as there is no current capability to do this from the offshore platforms. Trying to achieve this would require a substantial refit, which may not be possible owing to the capability of 3rd party control software, limitations on space on the offshore platform and necessitate a shut down of the wind farm. For all signals there is currently no capability to transfer these back to the NETSO. It is not certain that they would be available at Go Live. In this regard we note that a derogation would be provided to Section C, Part One, 2.1.3 of the

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STC but that a similar derogation to CC6.5 and 6.6 of the Grid Code is opposed by the NETSO. Whilst discussions with the NETSO are continuing we continue to be of the view that if there is no workable solution or the NETSO does not revise its signals requirements then derogations against these Grid Code provisions will be necessary.

We are also concerned that the requirements under the Balancing Codes may continue to apply. The NETSO expects the windfarms to be active BM participants. It would be our preference however for the windfarms to not actively participate in the BM. Should P242 be approved this would support this position. We would expect to revisit these requirements in light of any decision on P242.

Please do not hesitate to contact me if you would like to discuss our response further.

Yours sincerely

Guy Phillips
Senior Project Developer