

Our Ref
Your Ref

Direct line: 020 7752 2200
Fax: 020 7752 2128

Bridget Morgan
Technical Directorate
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE



Date 9 January 2004

Dear Bridget,

**Response to GB Grid Code, Connection Conditions, Operating Code 5 and General Conditions
An Ofgem/DTI mini-drafting consultation. Ref: 154/03**

EDF Energy welcomes the opportunity to comment on this mini consultation.

Your document has highlighted a key technical difference. It is that presently in the EWGC, 'Small Power Stations, hydro units and renewable energy plant not designed for frequency and voltage control are excluded from the obligation to comply with the 'General Generating Unit Requirements' in CC.6.3. Including these words in the GBGC to apply to Scottish plant would be a relaxation of the existing requirements in Scotland.

We do not see that a problem should arise commercially, from the point of view of the plant owners and operators, since the exclusion would be from the obligation to comply. In other words these categories of plant could still offer to provide balancing services if they wished.

However, we do have an issue with the naming of these categories. In Scotland, hydro units are not necessarily small and their ability to provide both voltage and frequency control for system security is likely to be fundamental. If the present obligation is relaxed, and a plant owner decides for whatever reason not to provide voltage and frequency control, then significant issues may arise both for power system control and security. One outcome could be that new transmission or distribution infrastructure is required to overcome the loss, with all the complexities of cost allocation for the new build.

We therefore feel very cautious about any relaxation in this obligation for any categories of plant in Scotland. We would therefore support your proposed

CC.6.3.1 drafting and object to the relaxation, unless those parties with past experience and future responsibility for system security can demonstrate convincingly that such a relaxation will have no detrimental impact going forward.

We would take this opportunity to draw your attention to what we believe is a typographical mistake on page 20 of the consultation document. We believe that the second underlined text (relating to CC.6.3.7(f) should read:
'..... before 1 April 2005 in Scotland'.

We hope that you will find these comments useful. If you have any queries please do not hesitate to contact Paul Chesterman on 020 7752 2527, or myself.

Yours sincerely

Denis Linford

Head of Regulation