

Bridget Morgan
Technical Directorate
Ofgem
9 Millbank
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Date: 7th January 2004

Dear Bridget,

Powergen UK response to GBGC CC Mini-consultation

Thank you for the opportunity to respond to the GB Grid Code Connection Conditions and General Conditions mini-consultation. This response is on behalf of Powergen UK, Powergen Retail and Cottam Development Centre Limited.

Connection Conditions

- CC.6.1.3 will require further work in the future. For BETTA, given the relative sizes of Small Generators in Scotland, and Medium Power Stations in England and Wales, relaxation of the requirement to comply with Grid Code may be appropriate for Small Embedded Power Stations in Scotland. DTI/Ofgem may wish to consider information not generally available, such as the level of compliance with the current Scottish Grid Code. If all existing Power Stations of this type have derogations such that they are non-compliant, there seems little point in propagating an unnecessary requirement in the GB Grid Code. For the future, work should be undertaken similar to that ongoing on Licence Exempt Medium Power Stations. At the moment, the Licence Exempt Medium Power Stations Joint Working Group (E&W Grid Code and GB Distribution Code) is considering how to ensure that any Medium Power Station complies with the minimum technical requirements laid out in E&W Grid Code.

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Similarly, the minimum technical requirements for Small Power Stations should be established, and a view taken as to whether these requirements can be enforced via the Distribution Code, or whether compliance with a portion of the Grid Code may be necessary.

- CC.6.1.7(b) raises concerns about potential conflict, or at least the need for alignment, with the GB Distribution Code and Engineering Recommendations. We are concerned by the reference to “voltages 132 kV **and below**” in the proposed drafting. Although the lower voltages are indeed addressed by P28, they are governed by the GB Distribution Code, not the Grid Code. Although the drafting as presented does not create a conflict, the governance for the different networks must be clear.
- The intent of CC.6.2.2.2(c) and CC.6.2.3.1(c)(i) is clear, and we support the regional variation at this time. The phrase “as the case may be” is repeated three times in each clause, and so the drafting should be made more elegant.
- CC.6.2.2.4 and CC.6.2.3.5 as proposed do not appear to be the result of a technical constraint, but a consequence of working methods. As such a regional difference should not be supported by the GB Grid Code. We suggest that the ability to proceed with work on written authority should be extended to England and Wales.
- CC.6.3.1 and other clauses are complicated by the outstanding Generic Provisions consultations in both E&W and Scotland. Until the outcome of the Ofgem deliberations on these consultations are known, it would seem sensible to maintain the regional difference. However, if DTI/Ofgem has access to information indicating that all plant in Scotland which would be caught by “Small Power Stations, hydro units and renewable energy plant not designed for Frequency and voltage control” has derogations to the point where it is not obliged to comply with the Clause, then it would be more pragmatic to apply the E&W drafting of this Clause to the GB Grid Code. This would remove the need for a regional difference.
- CC6.3.7(e) and (f) are appropriate in our view.

OC5

- We support the principle that OC5 should only contain regional variation to support those variations introduced in the Connection Conditions.

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General Conditions

- We support the proposed General Conditions Drafting.

If you have any queries, please do not hesitate to contact me on 024 7642 5378.

Yours sincerely,

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