## RWE Innogy



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Dear Bridget

# GB Grid Code Connection Conditions, Operating Code 5 and General Conditions Ofgem/DTI mini-drafting Consultation

Thank you for the opportunity to comment on the above BETTA consultation dated 28<sup>th</sup> November 2003. We have previously provided comments dated 25<sup>th</sup> November 2003 on Consultation Volumes 1 and 2, and 4<sup>th</sup> December 2003 on the Operating Codes. As stated previously, we are generally supportive of the approach being taken by Ofgem in using the E&W Grid Code as a basis for the GB Grid Code. Our comments on this mini-consultation are as follows: -

#### **Connection Conditions**

We do not accept that the reasons given in 4.23 are sufficient to retain a regional difference. Any requirement for more than one circuit breaker as a condition of connection is unlikely to be driven by the technical capability to interrupt the maximum short circuit current and, in most cases, would result in unnecessary connection costs. Given the intended application of the E&W CUSC and connection charging methodology to Scotland, we suggest that EWGC CC.6.2.2.1 should apply throughout GB

### **Operating Code 5**

We are satisfied with the proposal that EWGC OC5 is used as a basis for the GBGC subject to the changes given in Appendix 2. We note the comment given in 5.4 that many of the provisions relating to testing are covered under bilateral agreements in Scotland. We would welcome clarification that such provisions will be removed from the bilateral agreements, as part of the GB CUSC conformance process, such that the GBGC provisions would apply in a similar manner to all generators.

## **General Conditions**

We have no comments on the proposed changes to the General Conditions.

I trust that you will find the above comments helpful.

Yours sincerely

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