



## **AMENDMENT REPORT**

### **CUSC Proposed Amendment CAP151 Construction Agreements Works Register**

*The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CAP151*

|               |                                |
|---------------|--------------------------------|
| Amendment Ref | CAP151                         |
| Issue         | 1.0                            |
| Date of Issue | 18 <sup>th</sup> December 2007 |
| Prepared by   | National Grid                  |

**I DOCUMENT CONTROL****a National Grid Document Control**

| Version | Date     | Author        | Change Reference                               |
|---------|----------|---------------|--|
| 0.1     | 15/11/07 | National Grid | Draft for comment                              |
| 0.2     | 23/11/.7 | National Grid | Draft for Panel Vote                           |
| 0.3     | 10/12/07 | National Grid | Draft for Panel Comment following Vote         |
| 1.0     | 18/12/07 | National Grid | Formal version for submission to the Authority |

**b Document Location**

National Grid Website:

[www.nationalgrid.com/uk/Electricity/Codes/](http://www.nationalgrid.com/uk/Electricity/Codes/)

**c Distribution**

| Name                                       | Organisation |
|--|--------------|
| The Gas and Electricity Markets Authority  | Ofgem        |
| CUSC Parties                               | Various      |
| Panel Members                              | Various      |
| National Grid Industry Information Website |              |

|             |  |           |
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## **1.0 SUMMARY AND RECOMMENDATIONS**

### **Executive Summary**

- 1.1 CAP151 – Construction Agreements Works Register was proposed by National Grid at the CUSC Amendments Panel on the 29 June 2007. CAP151 aims to provide an obligation on National Grid to establish and maintain a register of Transmission Reinforcement Works. Until such Transmission Reinforcement Works are completed. Such works are set out in Generators' or Interconnector Owners' Construction Agreements or BELLAs.
- 1.2 It is intended that the register would be similar to the TEC register and MW register, which was implemented on 12<sup>th</sup> September 2007 (CAP145 Embedded MW Register).
- 1.3 Following the June CUSC Panel CAP151 proceeded to Working Group for 3 months. The Working Group supported CAP151 and believed that the proposal would provide Users with more relevant and timely information.

### **National Grid Recommendation**

- 1.3 National Grid, as the proposer of CAP151 is supportive of the Amendment Proposal, believing that it would better facilitate achievement of the Applicable CUSC Objectives (a) and (b).

### **Amendment Panel Recommendation**

- 1.4 The result of the Panel Recommendation Vote as to whether CAP151 BETTER facilitated the Applicable CUSC Objectives was as follows:

Original - Yes

## **2.0 PURPOSE AND INTRODUCTION**

- 2.1 This Amendment Report has been prepared and issued by National Grid under the rules and procedures specified in the Connection and Use of System Code (CUSC) as designated by the Secretary of State.
- 2.2 Further to the submission of Amendment Proposal CAP151 (see Annex 2) and the subsequent wider industry consultation that was undertaken by National Grid, this document is addressed and furnished to the Gas and Electricity Markets Authority ("the Authority") in order to assist them in their decision whether to implement Amendment Proposal CAP151.
- 2.3 CAP151 was proposed by National Grid and submitted to the CUSC Amendments Panel for consideration at their meeting on 29<sup>th</sup> June 2007. CAP151 Working Group Report was submitted to the CUSC panel meeting on 27<sup>th</sup> July 2007. Following evaluation by the Working Group, the Amendments Panel determined that CAP151 was appropriate to proceed to wider industry consultation by National Grid.
- 2.4 This document outlines the nature of the CUSC changes that are proposed. It incorporates National Grid's recommendations to the Authority concerning the Amendment. Copies of all representations received in response to the

consultation have been also been included and a 'summary' of the representations received is also provided. Copies of each of the responses to the consultation are included as Annex 3 to this document.

- 2.5 This Amendment Report has been prepared in accordance with the terms of the CUSC. An electronic copy can be found on the National Grid website, at [www.nationalgrid.com/uk/Electricity/Codes/](http://www.nationalgrid.com/uk/Electricity/Codes/).

### **3.0 PROPOSED AMENDMENT**

- 3.1 CAP151 proposes to amend the CUSC to provide an obligation on National Grid to establish and maintain a register of Transmission Reinforcement Works, until such Transmission Reinforcement Works are completed. Such works are set out in Generators' or Interconnector Owners' Construction Agreements or BELLAs.

- 3.2 The Works Register will, in respect of each such Construction Agreement and BELLA, set out:

- the name of the Generator or Interconnector Owner;
- the Connection Site (or in the case of an Embedded Generator the site of connection);
- the Completion Date(s); and
- the Transmission Reinforcement Works which relate to such Construction Agreement and BELLA (each as amended from time to time).

- 3.3 The Works Register shall be updated on the National Grid website to include the details of a new agreement within 10 business days of the completion of a new agreement or any changes to an existing agreement if such change affects any item in the Works Register.

- 3.4 It is proposed that the register will provide a more comprehensive and timely picture of the transmission works required to connect a generation project. The register is intended to provide a process for mapping planned works against signed construction agreements in order to facilitate the connection of generation projects. This information will provides Users with the ability to determine potential gaps that could appear as a consequence of a User reducing capacity or terminating their construction agreement(s) or BELLA(s).

- 3.5 At present there is limited timely public information on the transmission works required to connect generation projects. Generic data is currently contained within table 6.2 of the Seven Year Statement, however this data is limited and not contract specific. The information is only updated annually. Therefore it is difficult for developers and potential developers to determine the impact of any new application or the consequence/opportunity of project attrition, particularly within a local cluster.

### **4.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES**

#### **Proposed Amendment**

- 4.1 CAP151 would better facilitate the CUSC Objective(s);

- (a) the efficient discharge by the Licensee of the obligations imposed upon it by the act and the Transmission Licence; and
- (b) facilitating effective competition in generation and supply of electricity and facilitating such competition in the sale, distribution and purchase of electricity.

4.2 CAP151 will provide Users with a more comprehensive and timelier picture of GB transmission capacity. This will facilitate Users to identify opportunities to connect earlier as a result of changes to the contracted background.

## **5.0 PROPOSED IMPLEMENTATION**

5.1 The Working Group and National Grid propose CAP151 should be implemented 10 business days after an Authority decision.

## **6.0 IMPACT ON THE CUSC**

6.1 CAP151 requires amendments to Section 6 & 11 of the CUSC.

6.2 The text required to give effect to the Original Proposal is contained as Annex 1 of this document.

## **7.0 IMPACT ON CUSC PARTIES**

### **Proposed Amendment**

7.1 CAP151 has no impact upon CUSC parties.

## **8.0 IMPACT ON INDUSTRY DOCUMENTS**

### **Impact on Core Industry Documents**

8.1 CAP151 has no impact upon Core or other Industry Documents and processes used by CUSC Parties. CAP151 has a limited impact on National Grid's computer systems as amendments are already required to National Grid's data and as such the only additional burden imposed by this Amendment will be the uploading of the revised data onto the National Grid website as and when required.

### **Impact on other Industry Documents**

8.2 CAP151 has no impact upon other Industry Documents.

## **9.0 IMPACT ON INDUSTRY COMPUTER SYSTEMS OR PROCESSES**

9.1 CAP151 has no impact upon on Industry Computer Systems or Processes.

## **10.0 VIEWS AND REPRESENTATIONS**

- 10.1 This Section contains a summary of the views and representations made by consultees during the consultation period in respect of the Proposed Amendment.

#### Views of Panel Members

- 10.2 No views or representations were made by Panel Members in their capacity as Panel Members during the Consultation

#### View of Core Industry Document Owners

- 10.3 No views or representations were made by Core Industry Document Owners

#### Working Group

- 10.4 The Working Group supports CAP151 Working Group Alternative Amendment and believes the Alternative better facilitates Applicable CUSC Objective (a) and (b).

#### Responses to Consultation

- 10.5 The following table provides an overview of the representations received. Copies of the representations are attached as Annex 3.

| Reference    | Company   | Supportive | Comments  |
|--------------|---|------------|---|
| CAP151-CR-01 | British Energy  | Yes        | Supportive of the aims of this modification   |
| CAP151-CR-02 | BOC   | Yes        | Happy to support  |
| CAP151-CR-03 | Centrica  | Yes        | Believe it will provide a greater transparency of reinforcement works   |
| CAP151-CR-04 | EDF Energy  | Yes        | Will provide Users with a more comprehensive and timelier picture of works associated with transmission entry capacity  |
| CAP151-CR-05 | E.ON UK   | Yes        | Would allow developers to look at the generation background in more detail.   |
| CAP151-CR-06 | RWE   | Yes        | Would better facilitate the Applicable CUS Objectives, however some concerns raised (detailed in the response)  |
| CAP151-CR-07 | Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd | Yes        | Agree that this Amendment Proposal would better facilitate the achievement of the Applicable CUSC Objectives  |
| CAP151-CR-08 | Scottish Power  | Yes        | Supports the publication of all data which helps complete a picture of ongoing transmission works and their impact, aiding the development of new generation opportunities. |

## **11.0 COMMENTS ON DRAFT AMENDMENT REPORT**

- 11.1 National Grid received no responses following the publication of the draft Amendment Report.

## **12.0 AMENDMENT PANEL RECOMMENDATION**

- 12.1 The result of the Panel Recommendation Vote as to whether CAP151 BETTER facilitated the Applicable CUSC Objectives was as follows:

Original - Yes

## **13.0 NATIONAL GRID RECOMMENDATION**

- 13.1 National Grid, as the proposer of CAP151 is supportive of the Amendment Proposal, believing that it would better facilitate achievement of the Applicable CUSC Objectives (a) and (b).

## ANNEX1 – PROPOSED LEGAL TEXT TO MODIFY THE CUSC

The Proposed legal text to modify the CUSC is detailed below by inserting the coloured and underlines text at the end of the Section 6 of the CUSC and renumbering as appropriate.

### 6.] Transmission Works RegisterC

6.].1 The Company shall establish and maintain a Transmission Works Register in respect of Transmission Works set out in Generators' and Interconnector Owners' Construction Agreements and/or set out in the relevant Construction Agreement with the owner/operator of the Distribution System in respect of an Embedded Exemptable Large Power Station which is the subject of a BELLA (until such Transmission Works are completed) which it shall publish on The Company Website recording the details set out in Paragraph 6.].2.

6.].2 The Transmission Works Register shall in respect of each such Construction Agreement set out the name of the Generator or Interconnector Owner, the Connection Site (or in the case of an Embedded Generator the site of connection), the Completion Date(s), and the Transmission Works which relate to such Construction Agreement (each as amended from time to time).

6.].3 The details referred to a Paragraph 6.].2 shall be recorded on the Transmission Works Register within 10 Business Days of the completion of such agreements or any changes to an existing agreement if such change affects any item in the Transmission Works Register.

Insert the following coloured and underlined text into Section 11 of the CUSC at the appropriate place

### Transmission Works

Register the register set up by The Company pursuant to Paragraph 6.].1.

Transmission Works in relation to a particular User, those works which are specified in Appendix H to the relevant Construction Agreement, where Part 1 is works required for the User and Part 2 is works required for wider system reasons.



**ANNEX 2 – AMENDMENT PROPOSAL FORM**

|  |                |
|--|----------------|
| <b>CUSC Amendment Proposal Form</b>  | <b>CAP:151</b> |
| <i>Title of Amendment Proposal:</i>  |                |
| <b>Construction Agreements Works Register</b>  |                |
| <i>Description of the Proposed Amendment (mandatory by proposer):</i>  |                |
| <p>It is proposed to amend the CUSC to provide an obligation on the Company to establish and maintain a register of Transmission Reinforcement Works set out in Generators' and Interconnector Owners' Construction Agreements and/or BELLAs, until such Transmission Reinforcement Works are completed.</p> <p>The Works Register will, in respect of each such Construction Agreement and BELLA, set out:</p> <ul style="list-style-type: none"> <li>• the name of the Generator or Interconnector Owner,</li> <li>• the Connection Site (or in the case of an Embedded Generator the site of connection),</li> <li>• the Completion Date(s) and;</li> <li>• the Transmission Reinforcement Works which relate to such Construction Agreement and BELLA (each as amended from time to time).</li> </ul> <p>The Works Register shall be published on the Company Website within 10 business days of completing the agreements.</p> <p>It is proposed that the register will provide a more comprehensive and timely picture of the works required to connect a certain generation project. The register is intended to provide a process for mapping works against construction agreements entered into to facilitate the connection of generation projects. This information will enable users to better determine any gaps that could appear as a consequence of a user reducing capacity or terminating their construction agreements.</p> |                |
| <i>Description of Issue or Defect that Proposed Amendment seeks to Address (mandatory by proposer):</i>  |                |
| <p>There is currently very little information on the works required to connect any generation projects and it is therefore difficult for developers and potential developers to determine the impact of any new application or the consequence/opportunity project attrition. Some of this data is contained within table 6.2 of the Seven Year Statement, however this data is limited and not contract specific.</p>   |                |
| <b>Impact on the CUSC</b> <i>(this should be given where possible):</i>  |                |
| None anticipated   |                |
| <b>Impact on Core Industry Documentation</b> <i>(this should be given where possible):</i>   |                |
| None anticipated   |                |
| <b>Impact on Computer Systems and Processes used by CUSC Parties</b> <i>(this should be given where possible):</i>   |                |
| <b>Development of the Company's website to include this data.</b>  |                |

**Details of any Related Modifications to Other Industry Codes** (where known):**Not Applicable****Justification for Proposed Amendment with Reference to Applicable CUSC Objectives\*\* (mandatory by proposer):**

This amendment will provide Users with a more comprehensive and timelier picture of GB transmission capacity. This will facilitate Users to identify opportunities to connect earlier as a result of changes to the contracted background. If implemented the proposed changes will further the efficient use of the system and better facilitate competition in generation. Consequently, better facilitating both CUSC Applicable Objective's (a) and (b).

|  |   |
|--|---|
| <b>Details of Proposer:</b><br>Organisation's Name:  | National Grid   |
| <i>Capacity in which the Amendment is being proposed:</i><br>(i.e. CUSC Party, BSC Party or "energywatch")     | CUSC Party  |
| <b>Details of Proposer's Representative:</b><br>Name:<br>Organisation:<br>Telephone Number:<br>Email Address:  | Phil Collins<br>National Grid<br>01926 656143<br><a href="mailto:Phil.Collins@uk.ngrid.com">Phil.Collins@uk.ngrid.com</a> |
| <b>Details of Representative's Alternate:</b><br>Name:<br>Organisation:<br>Telephone Number:<br>Email Address: | Clare Talbot<br>National Grid<br>01926 656377<br><a href="mailto:Clare.Talbot@uk.ngrid.com">Clare.Talbot@uk.ngrid.com</a> |
| <b>Attachments (Yes/No):</b><br><b>If Yes, Title and No. of pages of each Attachment:</b>                      |   |
| <b>ANNEX 1 – Proposed Legal Text</b><br><b>ANNEX 2 – Proposed Register</b>                                     |   |

**Notes:**

- Those wishing to propose an Amendment to the CUSC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 8.15 of the CUSC. The form seeks to ascertain details about the Amendment Proposal so that the Amendments Panel can determine more clearly whether the proposal should be considered by a Working Group or go straight to wider National Grid Consultation.
- The Panel Secretary will check that the form has been completed, in accordance with the requirements of the CUSC, prior to submitting it to the Panel. If the Panel Secretary accepts the Amendment Proposal form as complete, then he will write back to the Proposer informing him of the reference number for the Amendment Proposal and the date on which the Proposal will be considered by the Panel. If, in the opinion of the Panel Secretary, the form fails to provide the information required in the CUSC, then he may reject the Proposal. The Panel Secretary will inform the Proposer of the rejection and report the matter to the Panel at their

next meeting. The Panel can reverse the Panel Secretary's decision and if this happens the Panel Secretary will inform the Proposer.

The completed form should be returned to:

Beverley Viney  
Panel Secretary  
Commercial Frameworks  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Or via e-mail to: [Beverley.Viney@uk.ngrid.com](mailto:Beverley.Viney@uk.ngrid.com)

(Participants submitting this form by email will need to send a statement to the effect that the proposer acknowledges that on acceptance of the proposal for consideration by the Amendments Panel, a proposer which is not a CUSC Party shall grant a licence in accordance with Paragraph 8.15.7 of the CUSC. A Proposer that is a CUSC Party shall be deemed to have granted this Licence).

3. Applicable CUSC Objectives\*\* - These are defined within the National Grid Company Transmission Licence under Section C7F, paragraph 15. Reference should be made to this section when considering a proposed amendment.

**ANNEX 3 – REPRESENTATIONS RECEIVED DURING CONSULTATION**

This Annex includes copies of any representations received following circulation of the Consultation Document (circulated on 5<sup>th</sup> October 2007, requesting comments by close of business on 2<sup>nd</sup> November 2007).

Representations were received from the following parties:

| No. | Company   | File Number  |
|-----|---|--------------|
| 1   | British Energy  | CAP151-CR-01 |
| 2   | BOC   | CAP151-CR-02 |
| 3   | Centrica  | CAP151-CR-03 |
| 4   | EDF Energy  | CAP151-CR-04 |
| 5   | E.ON UK   | CAP151-CR-05 |
| 6   | RWE   | CAP151-CR-06 |
| 7   | Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd | CAP151-CR-07 |
| 8   | Scottish Power  | CAP151-CR-08 |

|                  |                |
|------------------|----------------|
| <b>Reference</b> | CAP151-CR-01   |
| <b>Company</b>   | British Energy |



Dear Beverley,

Thankyou for the opportunity to comment on CUSC Amendment Proposal CAP151 'Construction Agreements Works Register'. British Energy was pleased to be able participate in the working group and this response is made on behalf of the British Energy Group of companies. I can confirm that BE is supportive of the aims of this modification.

Yours Sincerely

John Morris  
Senior Trading Consultant  
British Energy, Power and Energy Trading  
T - +44 (0)1452 653492 Internal: 777 3492  
F - +44 (0)1452 653216 Internal: 777 3216  
M - +44 (0)7770 730398 Internal: 789 8050  
<http://www.british-energy.com>



|                  |              |
|------------------|--------------|
| <b>Reference</b> | CAP151-CR-02 |
| <b>Company</b>   | BOC          |

This seems a good idea, which BOC is happy to support.

**Chris Webb**

Commercial Manager - Utilities

DL +44 1709 842218 | Mob +44 7774 448426  
BOC Limited| Operations Centre | Bawtry Road | Brinsworth | Rotherham S60 5NT

www.linde.com | [chris.webb@boc.com](mailto:chris.webb@boc.com)

*Sent from The BOC Group plc, registered in England and Wales No. 22096, or from its subsidiary, BOC Limited, registered in England and Wales No. 337663-members of The Linde Group. Registered office of both companies - The Priestley Centre, 10 Priestley Road, Surrey Research Park, Guildford, Surrey, GU2 7XY, England.*

|                  |              |
|------------------|--------------|
| <b>Reference</b> | CAP151-CR-03 |
| <b>Company</b>   | Centrica     |



By Email  
Beverley Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Centrica Energy  
Millstream East,  
Maidenhead Road,  
Windsor,  
Berkshire SL4 5GD

Tel. (01753) 431000  
Fax (01753) 431150  
[www.centrica.com](http://www.centrica.com)

Our Ref.  
Your Ref.  
02 November 2007

Dear Beverley,

**CUSC Amendment Proposal CAP151 – Construction Agreements Works Register**

Centrica welcomes the opportunity to comment on National Grid's proposal to make the provision of information relating to Transmission Reinforcement Works available in the public domain.

Centrica are supportive of this proposal and believe that it will provide greater transparency of reinforcement works, thus enabling greater management of the so-called "GB Queue". This initiative will go some way towards addressing restrictions in access to the transmission system, however, Centrica also acknowledge that a number of subsequent, well thought-out initiatives are required to fully address the issues with the current access regime and planning timescales.

Centrica would like to stress the importance of timely maintenance of the proposed register as a means of encouraging confidence in the information that it contains.

If you have any questions or comments relating to this response, please contact me on the number above or at [laura.jeffs@centrica.com](mailto:laura.jeffs@centrica.com)

Yours sincerely,

Laura Jeffs  
Commercial Manager

**A *centrica* business**

Centrica plc - The group includes British Gas Trading, British Gas Services and Accord Energy  
Registered in England No.3033654. Registered Office: Millstream, Maidenhead Road, Windsor, Berkshire SL4 5GD

|                  |              |
|------------------|--------------|
| <b>Reference</b> | CAP151-CR-04 |
| <b>Company</b>   | EDF Energy   |

Beverly Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid [National Grid House]  
Warwick Technology Park  
Gallows Hill, Warwick  
CV34 6DA



29 October 2007

Dear Beverley,

**CAP151 Construction Agreements Works Register**

EDF Energy is pleased to have the opportunity to comment on CAP151.

It is our belief that the CUSC construction agreement (CONSAG) should represent a binding agreement between the GBSO (representing the TO) and the User to respectively commission transmission and power station assets.

We also believe that transparent market rules and clear information are vital in ensuring economically efficient decisions are made by competing developers.

We agree with the proposer that there is presently unsatisfactory public information on transmission works required to connect generation projects. Data in the Seven Year Statement is limited, not specific to CONSAGs and only updated annually.

CAP151 will provide Users with a more comprehensive and timelier picture of works associated with transmission entry capacity, reinforcing the link of the power station and transmission works. It will enable a User to understand how the market rules have been applied to its project in its commitment for transmission access.

Our preference is for data to be in a relational database, to investigate how multiple works are dependent on each project and how multiple projects are dependent on individual works.

Compared to current arrangements, CAP151 will better facilitate achievement of CUSC objectives A and B.

We hope that you will find these comments helpful. If you have any queries please do not hesitate to contact me.

Yours sincerely,

David Scott  
Electricity Regulation, Energy Branch

|   |  |  |   |
|---|--|--|---|
|    | <p><b>EDF Energy</b><br/>40 Grosvenor Place<br/>Victoria London SW1X 7EN</p> | <p><b>Tel +44 (0) 20 7752 2524</b></p> | <p><a href="http://edfenergy.com">edfenergy.com</a></p> |
| <p>EDF Energy plc. Registered in England and Wales. Registered No. 2366852. Registered Office: 40 Grosvenor Place, Victoria, London, SW1X 7EN</p> |  |  |   |

|           |              |
|-----------|--------------|
| Reference | CAP151-CR-05 |
| Company   | E.ON UK      |



Beverley Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid

By email: [Beverley.Viney@uk.ngrid.com](mailto:Beverley.Viney@uk.ngrid.com)

E.ON UK plc  
Westwood Way  
Westwood Business Park  
Coventry  
CV4 8LG  
[eon-uk.com](http://eon-uk.com)

Ben Sheehy  
024 7618 3381

[ben.sheehy@eon-uk.com](mailto:ben.sheehy@eon-uk.com)

Friday 2 November 2007

Dear Beverley,

**Response to the CAP151 Consultation, Construction Agreements Works Register**

Thank you for the opportunity to comment on CAP151. I write on behalf of E.ON UK to give our view that a new Construction Agreements Works Register would better facilitate the applicable objectives.

The register would allow developers to look at the generation background in more detail. The information could also potentially give rise to innovative project solutions, as developers would be able to see if other projects were dependent on the same works.

We hope that you'll find this point useful to your assessment.

Yours sincerely,

Ben Sheehy  
Trading Arrangements  
Energy Wholesale

E.ON UK plc  
Registered in  
England and Wales  
No 2366970  
Registered Office:  
Westwood Way  
Westwood Business Park  
Coventry CV4 8LG



|                  |              |
|------------------|--------------|
| <b>Reference</b> | CAP151-CR-06 |
| <b>Company</b>   | RWE          |

RWE Trading



Ms B Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid Electricity Transmission plc  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Name John Norbury  
Phone +44 (0)1793 892667  
Mobile +44 (0)7795 354382  
E-Mail john.norbury@RWE.com

E-mail: beverley.viney@uk.grid.com

■ 30<sup>th</sup> October 2007

Dear Beverley

**Consultation Document – CUSC Amendment Proposal CAP151  
Construction Agreements Works Register**

Thank you for the opportunity to comment on the CAP151 Consultation. The following response is provided on behalf of the RWE group of companies.

RWE was pleased to participate in the working group which considered this amendment proposal. We believe that the proposed Transmission Works Register would better facilitate the Applicable CUSC Objectives in providing greater clarity and transparency for Users seeking connection to the transmission system. However, we do have a few comments on the CAP151 proposal for your consideration:

1. The Consultation Document Paragraph 4.2 records that the Group considered whether this information would be better published in the Seven Year Statement (SYS). We are concerned that the introduction of such ad-hoc "registers" under the CUSC are potentially duplicating and effectively eroding the usefulness of the SYS, whose *"main purpose is to assist existing and prospective new users of the GB transmission system in assessing opportunities available to them for making new or additional use of the GB transmission system in the competitive electricity market"* (Nick Winser, May 2007). Furthermore, the SYS provides an established single reference for this information and the introduction of such registers will contribute to its fragmentation and increased confusion for both new and existing Users.
2. We are not convinced that the benefits of providing "a *broader, more complete picture*" and "*in a timelier manner*", as given in the Consultation Document Paragraph 4.2, could not be delivered via the SYS in either its current or an amended form. The SYS is available on-line to the industry and therefore it is difficult to understand how it could not be updated in similar timescales to that proposed for the CAP151 Register.

RWE Trading GmbH  
Swindon Branch  
Windmill Hill Business Park  
Whitehill Way  
Swindon SN5 6PB  
United Kingdom  
T +44(0)1793/87 77 77  
F +44(0)1793/89 25 25  
I www.rwe.com  
Registered No. BR 7373  
VAT Registration No.  
GB 524 921 354  
Advisory Board:  
Dr. Jürgen Großmann (Chairman)  
Management Board:  
Peter Terium (CEO)  
Dr Peter Kreuzberg  
Head Office:  
Essen, Germany  
Registered at:  
Local District Court, Essen  
Registered No.  
HR B14327

|                  |              |
|------------------|--------------|
| <b>Reference</b> | CAP151-CR-06 |
| <b>Company</b>   | RWE          |

(Page 2)

3. Given the apparent need by the industry for the information provided under this CAP151 Register and also the need for the information currently provided under the TEC Register, we would urge National Grid to consider the deficiencies and continued suitability for purpose of the SYS in its present format.
4. Regarding the proposed legal text, we continue to have difficulty understanding how the proposed new definition "Transmission Works" differs from the existing definition "Transmission Reinforcement Works", as both definitions would seem to be directing the reader to Appendix H Parts 1 and 2. However, it may be clearer to define "Transmission works" as (if this is what is intended):

*"in relation to a particular User, those works which are specified in Appendix H Part 1 and Appendix H Part 2 to the relevant Construction Agreement."*

5. The proposed legal text (line 1) states: "6.[ ] Transmission Works RegisterC" – we assume the "C" is a typographical error.

I trust you will find the above comments helpful. If you wish to discuss this further please do not hesitate to contact me.

Yours sincerely

By e-mail

John Norbury  
Network Connections Manager

|                  |   |
|------------------|---|
| <b>Reference</b> | CAP151-CR-07  |
| <b>Company</b>   | Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd |

Dear Sirs,

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.

In relation to the consultation concerning CAP 151 "Construction Agreements Works Register" (contained within your note of 5th October 2007) we agree with the view of National Grid that this Amendment Proposal would better facilitate the achievement of the Applicable CUSC Objectives.

Regards

Garth Graham  
Scottish and Southern Energy plc

|                  |               |
|------------------|---------------|
| <b>Reference</b> | CAP151-CR-08  |
| <b>Company</b>   | ScottishPower |



Beverley Viney  
Amendments Panel Secretary  
Electricity Codes  
National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

**Ref** CAP151  
**Date** 23<sup>rd</sup> October 2007

**Tel No.** 01355 845208  
**Email:** [ukelectricityspoc@saic.com](mailto:ukelectricityspoc@saic.com)

Dear Beverley,

**CUSC Amendment Proposal CAP151, Construction Agreements Works Register**

Thank you for the opportunity to comment on the Consultation for Amendment Proposal CAP158. This response is submitted on behalf of ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd.

ScottishPower supports the publication of all data which helps complete a picture of ongoing transmission works and their impact, aiding the development of new generation opportunities. This will allow us to respond to these events as they occur, and more easily track the progress of ongoing works.

Yours sincerely

**Gary Henderson**



For and on behalf of: ScottishPower's Energy Wholesale Business which includes ScottishPower Generation Ltd, ScottishPower Energy Management Ltd and CRE Energy Ltd.