



**CONSULTATION ALTERNATIVE
CONSULTATION DOCUMENT
CUSC Amendment Proposal CAP145
Embedded Generator MW Register**

*The purpose of this document is to
consult on Consultation Alternative
Amendment Proposal CAP 145
with CUSC Parties and other interested
Industry members*

Amendment Ref	CAP145
Issue	1.0
Date of Issue	15/03/07
Prepared by	National Grid

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

	Date	Author	Change Reference
0.1	08/03/07	National Grid	Initial Draft for internal comment
1.0	15/03/07	National Grid	Formal version for release

b Document Location

National Grid website:

www.nationalgrid.com/uk/Electricity/Codes/

c Distribution

Name	Organisation
CUSC Parties	Various
Panel Members	Various
Interested Parties	Various
Core Industry Document Owners	Various
National Grid Industry Information Website	-

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1.0 SUMMARY AND VIEWS

Executive Summary

- 1.1 CAP145 – Embedded Generator MW Register was proposed by National Grid and submitted to the Amendments Panel on 26th January 2007.
- 1.2 CAP145 aims to address an information gap regarding the publication of GB transmission capacity. At present the Transmission Entry Capacity (TEC) register publishes all new offers of TEC within 5 business days but does not include Embedded Generators with a BELLA or Relevant Embedded Medium Power Stations or Relevant Embedded Small Power Stations, even though all Users have an impact upon the total capacity of the GB transmission system. Therefore, if changes occur capacity may become available which could allow other Users to connect with fewer transmission works and / or to connect earlier than their currently contracted date (subject to the requisite Modification Application being made and the resulting Modification Offer being signed).
- 1.3 CAP145 proposes to develop and provide a register similar in format and information as the TEC Register to publish certain details regarding Embedded Generators with BELLA's, Relevant Embedded Medium Power Stations and Relevant Embedded Small Power Stations.
- 1.4 Consultation Alternative Amendment 1 (CAA1) was proposed by Renewable Energy Systems Limited (RES) which proposes that the new register does not include details of small power stations but is limited to publication of information on Relevant Embedded Medium Power stations and BELLA.
- 1.5 Consultation Alternative Amendment 2 (CAA2) was proposed by CE Electric UK and proposes that the legal text is altered to convey the intention that the register would cover contracts and not offers.

National Grids View

- 1.6 **CAA1** - National Grid believes that by removing the data for Relevant Embedded Small Power Station from the Register, this would reduce the amount of information available and therefore reduce the usefulness of the Register.
- 1.7 Though National Grid does not oppose CAA1 we believe that CAA2 and the original offer superior options and so National Grid do not support this alternative.
- 1.8 **CAA2** - National Grid supports this alternative, believing this better conveys the original intention of only applying to firm contracts, and by including the Relevant Embedded Small Power Stations it gives a fuller picture.
- 1.9 By retaining the Embedded Small Power stations it does not have the drawbacks of CAA1 and therefore this is the Amendment Proposal National Grid supports.

2.0 PURPOSE AND INTRODUCTION

- 2.1 This is a consultation document 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 CAP145 and the subsequent consultation, this document seeks views from industry members relating to the

Consultation Alternative Amendments for CAP145, proposed by RES and CE Electric UK.

- 2.3 CAP145 was proposed by National Grid and submitted to the CUSC Amendment Panel for consideration at their meeting on 26th January 2007. The Amendments Panel determined that the issue should proceed to wider industry consultation by National Grid.
- 2.4 CAP145 Consultation concluded on 8th March 2007. Consultation Alternative Amendment 1 to CAP145 was proposed by RES and Consultation Alternative Amendment 2 to CAP145 was proposed by CE Electric UK.
- 2.5 Under the terms of the CUSC there is a requirement for a further period of Consultation to be undertaken in order to allow the Industry to consider the proposed consultation alternative amendment. All the correspondence received in response to the original consultation is contained in Annex 2.
- 2.6 This consultation document outlines the Consultation Alternative Amendments. Representations received in response to this consultation document will be included in National Grid's Amendment Report that will be furnished to the Authority for their decision.
- 2.7 This Consultation Alternative consultation document 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/ along with the Original Consultation Report, and the Amendment Proposal form. This document invites views upon the Consultation Alternative Amendment and the **closing date is 29th March 2007 for responses.**

3.0 THE CONSULTATION ALTERNATIVE AMENDMENTS

- 3.1 **CAA1** – Renewable Energy Systems (RES) propose that the new register does not include details of small power stations but is limited to publication of information on Relevant Embedded Medium Power stations and BELLAs. In addition National Grid has spoken to RES and given CAA2 they are happy that their proposal also reflects that the register only applies to contracts and not offers, therefore the additional text included in CAA2 is also included in CAA1.
- 3.2 When compared to the original proposal, CAA1 removes the reference to Relevant Embedded Small Power Station, and adds the additional text ensuring that it is explicit that this information is only entered to the register once agreements have been entered into.
- 3.3 **CAA2** – CE Electric UK propose that it is a more practicable approach for the details of the Embedded Generator to be entered onto the MW register either when the DNO has entered into the Agreement to vary the Bilateral with National Grid, or the DNO has entered into a Construction Agreement with National Grid.
- 3.4 When compared to the original proposal CAA2 makes it explicit that the information is only entered onto the register once agreements have been entered into.

4.0 ASSESSMENT AGAINST APPLICABLE CUSC OBJECTIVES

Consultation Alternative Amendment 1

- 4.1 In the view of the proposer of Consultation Alternative Amendment 1, it would better facilitate the following CUSC Objectives;

(a) The efficient discharge by the licensee of the obligations imposed upon it under the Act and by the Transmission Licence

(b) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

Consultation Alternative Amendment 2

- 4.2 In the view of the proposer of Consultation Alternative Amendment 2, it would better facilitate the following CUSC Objectives;

(a) The efficient discharge by the licensee of the obligations imposed upon it under the Act and by the Transmission Licence

(b) Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity.

5.0 PROPOSED IMPLEMENTATION

- 5.1 The proposers of CAP145 Consultation Alternative 1 and 2 do not disagree with National Grid that CAP145 should be implemented 3 months after an Authority decision to ensure the register and the website can be developed.

6.0 IMPACT ON CUSC

- 6.1 CAP145 Consultation Alternative 1 and 2 require the introduction of new paragraphs in CUSC Section 6 – General Provisions, Section 11 – Interpretations and Definition and Exhibit U CUSC Request for a Statement of Works. The text required to give effect to the Proposals is contained in Annex 1 of this document.

7.0 IMPACT ON INDUSTRY DOCUMENTS

Impact on Core Industry Documents

- 7.1 Both CAA1 and CAA2 have no impact upon Core Industry Documents

8.0 INITIAL VIEW OF NATIONAL GRID

- 8.1 **CAA1** - National Grid believes that by removing the data for Relevant Embedded Small Power Stations from the Register, this would reduce the amount of information available and therefore reduce the usefulness of the Register.

- 8.2 Though National Grid does not oppose CAA1 we believe that CAA2 and the original offer superior options and so National Grid do not support this alternative.

- 8.3 **CAA2** - National Grid supports this alternative, believing this better conveys the original intention of only applying to firm contracts, and by including the Relevant Embedded Small Power Stations it gives a fuller picture.
- 8.4 By retaining the Embedded Small Power stations it does not have the drawbacks of CAA1 and therefore this is the Amendment Proposal National Grid supports.
- 8.5 In additional Airtricity suggested that the consideration of any change should take into account the conclusions of the Ofgem TADG process, however any Amendment Proposal can only be assessed against the current baseline, and therefore the potential outcome of the TADG process can not currently be taken into consideration.

9.0 VIEWS INVITED

- 9.1 National Grid is seeking the views of interested parties in relation to the issues raised by the Consultation Alternative Amendment Proposals CAP145.
- 9.2 Please send your responses to this consultation to National Grid by no later than **close of business on 29th March**

Please address all comments to the following e-mail address:

Beverley.Viney@uk.ngrid.com

Or alternatively, comments may be addressed to:

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

ANNEX 1 - PROPOSED TEXT TO MODIFY CUSC**Part A - Text to give effect to the Proposed Consultation Alternative Amendment 1**

(When compared the original proposal the underlined text is additional text and the text which has strikethrough is the text to be removed)

CUSC Section 6 – General Provisions

Insert the following new paragraphs as 6.34 and amend Section 6 contents page accordingly

6.34 Embedded Generator MW Register

6.34.1 The Company shall establish and maintain the Embedded Generator MW Register published on The Company Website recording the details set out in 6.34.2.

6.34.2 The Embedded Generator MW Register shall set out:

- the name of **Embedded Generator's** who have a **BELLA** or who are a **Relevant Embedded Medium Power Station** ~~or a Relevant Embedded Small Power Station,~~
- the site of connection to the **Distribution System** and the relevant **Grid Supply Point,**
- the proposed year of connection to the **Distribution System** and
- the maximum output of the **Embedded Generator's** in MW's as set out in the **BELLA** or provided by the **Authorised Electricity Operator** to whose **Distribution System** that **Embedded Generator** is to connect.

6.34.3 The Company shall record the details of any new BELLA's or any changes to existing BELLA's on the Embedded Generator MW Register within 5 Business Days of completion of such agreements being entered into by The Company.

6.34.4 The Company shall record the details provided by the Authorised Electricity Operator in respect of a Relevant Embedded Medium Power Station ~~or a Relevant Embedded Small Power Station~~ or any changes on the Embedded Generator MW Register within 5 Business Days of receipt of the information of the relevant agreements being entered into relating to such Relevant Embedded Medium Power Station or Relevant Embedded Small Power Station between the Authorised Electricity Operator and The Company.

CUSC Section 11 – Interpretation and Definitions

Insert the following new definition

Embedded Generator MW Register	the Register set up by The Company pursuant to Paragraph 6.34
---------------------------------------	--

Exhibit U – Request for a Statement of Works Users that own or operate a Distribution System

Insert a new sentence to the end of paragraph 1

PLEASE STUDY THE FOLLOWING NOTES BEFORE COMPLETING AND SIGNING THIS APPLICATION FORM.

- 1 The Company** requires the information requested in this application form for the purposes of assessing the impact of a **Relevant Embedded Medium Power Station** or a **Relevant Embedded Small Power Station upon the GB Transmission System.** It is essential that the **User** submitting this **Request for a Statement of Works** should supply all information requested in this application form and that every effort should be made to ensure that such information should be accurate. ~~Please note certain information provided in this application may be used in accordance with Paragraph 6.34.~~

ANNEX 1 - PROPOSED TEXT TO MODIFY CUSC**Part B - Text to give effect to the Proposed Consultation Alternative Amendment 2**

(When compared the original proposal the underlined text is additional text and the text which has ~~strikeout~~ is the text to be removed)

CUSC Section 6 – General Provisions

Insert the following new paragraphs as 6.34 and amend Section 6 contents page accordingly

6.34 Embedded Generator MW Register

6.34.5 **The Company** shall establish and maintain the **Embedded Generator MW Register** published on **The Company Website** recording the details set out in 6.34.2.

6.34.6 The **Embedded Generator MW Register** shall set out:

- the name of **Embedded Generator's** who have a **BELLA** or who are a **Relevant Embedded Medium Power Station** or a **Relevant Embedded Small Power Station**,
- the site of connection to the **Distribution System** and the relevant **Grid Supply Point**,
- the proposed year of connection to the **Distribution System** and
- the maximum output of the **Embedded Generator's** in MW's as set out in the **BELLA** or provided by the **Authorised Electricity Operator** to whose **Distribution System** that **Embedded Generator** is to connect.

6.34.7 **The Company** shall record the details of any new **BELLA's** or any changes to existing **BELLA's** on the **Embedded Generator MW Register** within 5 **Business Days** ~~of completion~~ of such agreements being entered into by **The Company**.

6.34.8 **The Company** shall record the details provided by the **Authorised Electricity Operator** in respect of a **Relevant Embedded Medium Power Station** or a **Relevant Embedded Small Power Station** or any changes on the **Embedded Generator MW Register** within 5 **Business Days** ~~of receipt of the information of the relevant agreements being entered into relating to such~~ **Relevant Embedded Medium Power Station** or **Relevant Embedded Small Power Station** between the **Authorised Electricity Operator** and **The Company**.

CUSC Section 11 – Interpretation and Definitions

Insert the following new definition

Embedded Generator MW Register	the Register set up by The Company pursuant to Paragraph 6.34
---------------------------------------	--

Exhibit U – Request for a Statement of Works Users that own or operate a Distribution System

Insert a new sentence to the end of paragraph 1

PLEASE STUDY THE FOLLOWING NOTES BEFORE COMPLETING AND SIGNING THIS APPLICATION FORM.

- 1** **The Company** requires the information requested in this application form for the purposes of assessing the impact of a **Relevant Embedded Medium Power Station** or a **Relevant Embedded Small Power Station** upon the **GB Transmission System**. It is essential that the **User** submitting this **Request for a Statement of Works** should supply all information requested in this application form and that every effort should be made to ensure that such information should be accurate. **Please**

note certain information provided in this application may be used in accordance with Paragraph 6.34.

ANNEX 2 – COPIES OF REPRESENTATIONS RECEIVED TO THE CONSULTATION DOCUMENT

This Annex includes copies of all representations received following circulation of the Consultation Document of CAP145 (circulated on 8th February 2007, requesting comments by close of business on 8th March 2007).

Representations were received from the following parties:

No.	Company	File No.
1	Airtricity	CAP145-CR-01
2	British Energy	CAP145-CR-02
3	Centrica	CAP145-CR-03
4	CE Electric UK	CAP145-CR-04
5	EDF Energy	CAP145-CR-05
6	E.ON UK	CAP145-CR-06
7	Renewable Energy Systems Limited	CAP145-CR-07
8	Scottish Power	CAP145-CR-08

Reference	CAP145-CR-01
Company	Airtricity

Airtricity House, Ravenscourt Office Park,
Sandyford, Dublin 18, Ireland.
Tel: + 353-1-213 0400 Fax: + 353-1-213 0444 Website: www.airtricity.com



Beverley Viney
Commercial Frameworks
National Grid House
Gallows Hill
Warwick
CV34 6DA

8 March 2007

Dear Beverley,

CAP145 - Consultation response

Airtricity welcomes the opportunity to respond to CUSC Amendment Proposal 145, for an Embedded Generator MW register.

The proposal suggests that it will enable Users (whether they are Transmission or Distribution connected) to better determine whether there is a likelihood that fewer transmission works would be needed to facilitate their connection or whether they could connect earlier than their currently contracted date.

In the case where there is a queue of users wishing to connect, the requirement should be for an enhanced and effective queue management system, operated by National Grid, rather than seeking to place the burden on applicants who will [necessarily] always have less information on the totality of circumstances surrounding queue issues, than National Grid.

Whilst seeking to provide a more complete and timelier picture of transmission grid capacity is a reasonable objective, the current amendment proposal does not better facilitate that aim.

A register publishing certain details about Embedded Generators with BELLAs, Relevant Medium Power Stations and Relevant Small Power Stations similar to the information provided on the TEC register is proposed.

The degree of interpretation attached to the term "relevant small power stations" is considerable. A small power station qualifies as a "relevant small power station" provided that the particular distribution system operator reasonably believes that there may be a significant effect on the wider Main Interconnected Transmission System.

The process by which a DNO makes this assessment will vary from one DNO to another and may vary from case to case. Therefore the use of "relevant" small power stations will provide an inconsistent data set. If the qualification is amended to be small power stations, then this will extend down to potentially large numbers of installations with capacities of a few MW.

The impact of small power stations will, in the first instance, be on the relevant distribution network, as will the growth or decline in demand. The summation of demand and generation effects will in turn determine the investment levels required at the interface between the distribution and

transmission systems. The proposed register does not provide a complete picture as it ignores both the demand side and the net interaction between generation and demand at the system interface.

In order to more fully consider the appropriate requirements for information exchange between distribution systems and the transmission system, consideration of any change should take into account the conclusions of the Ofgem TADG process, which will be published shortly. This will give a broader and more complete perspective on the issues that this amendment seeks to address. In particular, any proposal for change needs to be mindful of the wider context of the treatment of distributed generation generally.

Should the outcome of industry consultations suggest that a “net DNO agent model” fulfils the future needs of distributed generation development, CAP 145 would be redundant.

Yours sincerely

Robert Longden
UK Regulatory Affairs Manager

Reference	CAP145-CR-02
Company	British Energy



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

7th March 2007

Dear Beverley

**British Energy response to the Consultation Document on CUSC Amendment Proposal
CAP145 'Embedded Generator MW Register'**

This response is made by British Energy Group plc. British Energy is the UK's largest generator of electricity. We own and operate eight nuclear power stations as well as Eggborough Power Station (a large coal plant with two units fitted with FGD) and four small embedded gas generator sites. British Energy is also a large supplier selling exclusively to Industrial and Commercial customers. British Energy Direct accounts for around 30TWh of the UK supply. British Energy welcomes the opportunity to respond to the above consultation.

British Energy is supportive of National Grid's proposal to produce a register, similar to the TEC register, to publish details about Embedded Generator's with BELLA's, Relevant Medium Power Stations and Relevant Small Power Stations.

We believe that this proposal will increase transparency of the transmission capacity to Users, allowing more efficient use of the existing capacity and therefore facilitating better competition in generation.

We agree that the proposed implementation date of 3 months following an Authority decision allows sufficient time for development of the new register and website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Allport', written over a vertical red line.

Louise Allport
Trading Consultant
Transmission and Trading Arrangements
British Energy Power and Energy Trading

British Energy Group plc Barnett Way Barnwood Gloucester GL4 3RS
Telephone 01452 652222 Facsimile 01452 653715

Registered Office: Systems House, Alba Campus, Livingston EH54 7EG
Registered in Scotland No. 270184 VAT Number 671 0076 58

Reference	CAP145-CR-03
Company	Centrica



Beverley Viney
Amendments Panel Secretary
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National Grid House
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Centrica Energy

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Maidenhead Road,
Windsor,
Berkshire SL4 5GD

Tel. (01753) 431000
Fax (01753) 431150
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Our Ref.
Your Ref.
08 March 2007

Dear Beverley,

CUSC Amendment Proposal P145 – Embedded Generator MW Register

Centrica welcomes the opportunity to comment on this Amendment Proposal.

We believe that the proposed publication of additional information will improve transparency and can only be beneficial to the market. The proposal will better facilitate competition and therefore CUSC Objective (b) by providing a more complete picture of the Transmission System, thus enabling Parties to make robust investment decisions.

If you have any queries in relation to this response, please do not hesitate to contact me.

Best regards,

Dave Wilkerson
Centrica Energy

T: 01753 431157
M: 07789 572724
E: dave.wilkerson@centrica.co.uk

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Centrica plc - The group includes British Gas Trading, British Gas Services and Accord Energy
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Reference	CAP145-CR-04
Company	CE Electric UK



Your ref

Our ref

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

Network Investment

98 Aketon Road
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WF10 5DS

<http://www.ce-electricuk.com/>

tel: 01977 605923

fax: 01977 605594

e-mail: graeme.vincent@ce-electricuk.com

8th March 2007

Dear Beverley,

CUSC Amendment Proposal 145 – Embedded Generator MW Register

I'm writing on behalf of Northern Electric Distribution Limited (NEDL) and Yorkshire Electricity Distribution plc (YEDL), the licensed electricity distributors of CE Electric UK Funding Company Ltd.

In general, we are supportive of the proposal to establish a MW Register and recognise that this will enhance the existing requirement that Distribution Network Operators have to notify National Grid of generators greater than 5MW connected to the Distribution System for inclusion within their Seven Year Statement.

However, I would like to raise concerns regarding the point in time at which the generator details are made available on the MW Register. If a generator is deemed to be a Relevant Embedded Small or Relevant Embedded Medium Power Station then a Request for A Statement of Works (SoW) is required to be submitted to National Grid. This process raises two issues related to the timing of entering Embedded Generator details on a MW Register:

1 When a SoW submission is made there is still uncertainty whether the project will proceed. The SoW process makes an allowance for this, as the DNO can, after consultation with the project developer, cancel the enquiry with NG. It would be inappropriate to include a generation project on the MW Register until the developer has confirmed his intention to proceed with the development.

2 A SoW application must be made in the case of a Relevant Embedded Medium Power Station or a Relevant Embedded Small Power Station. Whether a Power Station should be considered to be a Relevant Medium Embedded Power Station is clearly defined in CUSC. However the CUSC definition of a Relevant Embedded Small Power Station is not as clearly defined, as it relies on the judgement of the DNO as to whether it may have a 'significant system effect'. Inherent in the application process is the possibility that a Small Power Station initially considered to be 'Relevant' may subsequently, on completion of more detailed assessment, be considered not to be 'Relevant'. It would be inappropriate to

CE ELECTRIC UK FUNDING COMPANY

Registered Office: Lloyds Court, 78 Grey Street, Newcastle upon Tyne, NE1 6AF. Registered in England: 3476201

include Embedded Generator details on the MW Register until the project has been confirmed as being 'Relevant'.

In addition I believe there may be issues associated with Commercial Confidentiality regarding the provision of the information at such an early stage in a projects lifecycle and therefore it will be necessary to ensure that all parties are comfortable with this information being made publicly available.

To address these points, it is suggested that a more practicable approach would be for the details of the Embedded Generator to be entered onto the MW Register either when the generator has entered into a connection agreement with the relevant DNO or when the DNO has entered into the Agreement to Vary the Bilateral with National Grid. At this stage the status of the Embedded Generator will have been confirmed, there will be more certainty that the project will continue to be developed and there is much more certainty over the connection timescales. It is our view that such an approach would align more closely with the CUSC objectives than that described in the CAP 145 proposal.

Yours sincerely,



Graeme Vincent
Network Investment Engineer

Reference	CAP145-CR-05
Company	EDF Energy

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



05 March 2007

Dear Beverley,

CUSC Amendment Proposal CAP145 Embedded Generator MW Register

EDF Energy is pleased to have the opportunity to comment on the CUSC amendment proposal, CAP145.

EDF Energy is supportive of the amendment proposal, believing that in relation to the current arrangements it will better facilitate achievement of both CUSC Objectives A (efficient discharge by The Company of the obligations imposed on it by the Act and the Transmission Licence) and B (facilitating effective competition in the generation and supply of electricity).

EDF Energy has been concerned that the capacity of embedded generators and the impact this has on the transmission system is not sufficiently transparent. The embedded TEC register will help in demonstrating that NGET and the DNOs can effectively manage the connection of significant capacity of embedded generation.

The consultation document states that NGET takes the presence of BELLAs, Relevant Embedded Medium Power Stations and Relevant Embedded Small Power Stations into account when designing and reinforcing the transmission system, through data received under the Grid Code. This information should be published, as it is inconsistent with arrangements for directly connected stations that NGET does not do so.

It must be noted that as proposed, CAP145 will only account for “Relevant” embedded generators that “may have a significant system effect on the GB transmission system”, rather than all generators. It will not include all the embedded generators and will not represent the total generation capacity in each distribution network operator’s GSP Group.

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

Yours sincerely,

David Scott
Energy Regulation, Energy Branch

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

Reference	CAP145-CR-06
Company	E.ON UK



Beverley Viney
Amendments Panel Secretary
Electricity Codes
National Grid

By email: Beverley.Viney@uk.ngrid.com

E.ON UK plc
Westwood Way
Westwood Business Park
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CV4 8LG
eon-uk.com

Ben Sheehy
024 7618 3381

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—
Wednesday 7 March 2007

Dear Beverley,

Consultation Response: CUSC Amendment Proposal CAP145, Embedded Generator MW Register

Thank you for the opportunity to comment on Amendment Proposal CAP145. E.ON UK believes that an Embedded Generator MW Register, by presenting Seven Year Statement (SYS) data in a similar format to, and in the same timescale as, the TEC Register, would be a helpful improvement to the transparency of information. As such it would better facilitate achievement of the Applicable CUSC Objectives.

We appreciate that National Grid is considering measures to progress the management of the GB transmission queue. However we are also aware that, analytically useful as the data would be, there currently isn't a mechanism in place that would allow Users to act in any practical way if new connection opportunities were identified. That said, with future developments in mind, we support the Proposal.

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

Reference	CAP145-CR-07
Company	Renewable Energy Systems Limited



Renewable Energy Systems Limited
Beaufort Court, Egg Farm Lane
Kings Langley, Hertfordshire
WD4 8LR United Kingdom
Telephone: +44 (0) 1923 299 200
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Email: info@res-group.com
Web: www.res-group.com

Direct Dial: +44 (0) 1923 299 374
E-Mail: richard.ford@res-ltd.com

23 February 2007

Beverley Viney
National Grid
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Our Ref:

Dear Beverley,

CAP145 - Consultation response

Thank you for the opportunity to respond to this consultation on CUSC Amendment Proposal 145 for an Embedded Generator MW register.

The proposal assumes that the provision of more complete information will allow better decisions by users when deciding whether to make a connection application or amend a connection offer. Where there is an existing queue of connection applications, this is inefficient and time-consuming. In these circumstances what is needed is decent queue management by National Grid to allow applicants awaiting connection to be connected at the earliest practicable date.

RES recognises National Grid's intent to provide a more complete and timelier picture of transmission grid capacity but does not believe that this amendment proposal achieves that aim.

The proposed register would include information on "relevant small power stations". Although this is a defined term in the CUSC it is poorly defined. A small power station qualifies as a "relevant small power station" if the associated DNO reasonably believes that there may be a significant system effect on the GB transmission system. This assumes that the DNOs are qualified to make qualitative assessments of the transmission system. In addition a decision as to whether a particular power station qualifies as a "relevant small power station" may vary from DNO to DNO or even from time to time with a single DNO. In consequence, the inclusion of "relevant small power stations" will not provide a complete picture of grid capacity.

The inclusion of data on small power stations will include data on some power stations of only a few MW. If power stations of this size have a significant impact on transmission capacity then so does the emergence and closure of similar sized demands. As the register will not include demand data, it will not be providing a complete picture.



Registered in England & Wales Number 1589961
Registered Office as above
A member of the Sir Robert McAlpine Group

Document Reference: ENG-000045

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RES does not support CAP145 in its current form. As noted above, we believe that this is not an adequate substitute for robust queue management. However, if the proposal is to proceed we suggest, as a Consultation Alternative Amendment, that the new register does not include details of small power stations but is limited to publication of information on Relevant Embedded Medium Power stations and BELLAs.

Yours sincerely,

Richard Ford
Grid Connections Manager
Renewable Energy Systems

CC: File

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Document Reference: ENG-000045

Reference	CAP145-CR-08
Company	Scottish Power

ScottishPower

energy wholesale

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

Your ref

Our ref

Date

5 March 2007

Contact/Extension

0141 568 4469

Dear Beverley,

CAP145 Embedded Generator MW Register

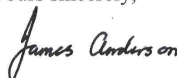
Thank you for the opportunity to respond to this consultation document. This response is submitted on behalf of ScottishPower Energy Wholesale, which includes the UK energy businesses of ScottishPower, namely ScottishPower Energy Management Ltd, ScottishPower Generation Ltd and ScottishPower Energy Retail Ltd.

ScottishPower does not agree with the statement at 1.2 that “all users have an impact upon the total capacity of the GB transmission system” and does not agree with the statement at 3.3 that Relevant Embedded Medium and Small Power Stations “also impact upon the total capacity of the GB transmission system”. When embedded generators are connected at GSPs where all of their output can be absorbed by demand at that GSP then the location of that embedded generator reduces the need for reinforcement of the GB transmission system. Only where an embedded generator results in a net export at the relevant GSP can it be considered to have an impact on the GB transmission system.

However, ScottishPower agrees that the creation of an Embedded Generator MW Register would address an information gap and would aid the decision process of where to locate an embedded generator. ScottishPower would therefore support the introduction of an embedded generation MW register as outlined in the proposal.

I hope you find these comments useful. Should you have any queries on the points raised, please feel free to contact us.

Yours sincerely,



James Anderson
Commercial & Regulation

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