

Steven Lam
Amendments Panel Secretary
National Grid Electricity Transmission plc
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Tom Ireland
Commercial Analyst

thomas.ireland@uk.ngrid.com
Direct tel +44 (0)1926 656152

www.nationalgrid.com

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Dear Steve

WITHDRAWAL OF CAP181: CONSEQUENTIAL CHANGES RELATED TO GRID CODE AMENDMENT A/10 (Compliance)

I am writing to you as Proposer of CAP181 to inform you that I wish to withdraw my support for the Amendment Proposal for the reasons set out below.

National Grid raised CAP181 as a consequential change of the Grid Code amendment A/10. A/10, in its original form, sought to formalise a compliance process within the Grid Code for all new generators and Direct Current Converter Stations (DCCS) to improve consistency and visibility of the existing processes. As part of the work carried out on A/10, it was identified that the new arrangements would create potentially unlimited liabilities between National Grid, CUSC Parties and Licence Exemptible Embedded Medium Power Stations (LEEMPS) during the process of LEEMPS compliance assessment. CAP181 was raised to address this issue of liability within the CUSC to ensure parties were not exposed to unlimited liability, which would be inconsistent with the current compliance assessment process for a directly connected generator.

CAP181 was raised whilst A/10 was at the Grid Code Working Group Consultation stage to ensure that the development, consultation and implementation of the various consequential code changes were performed in parallel with the Grid Code modification. However, following the industry consultation for the associated Grid Code proposal A/10, National Grid has published a Further Consultation on topic following comments received the industry and further consideration by National Grid. One key change to the revised proposals was the removal of any changes to the LEEMPS compliance process as National Grid no longer believes such changes would better meet its licence objectives. The result of this is that the defect that CAP181 sought to solve, will no longer be introduced following the implementation of the revised A/10 proposals.

Consequently, as the liability issue which CAP181 sought to address is no longer going to be introduced, I would like to withdraw my support for CAP181.

Yours sincerely

Tom Ireland (by email)

Commercial Analyst

National Grid