Transmission Access
Future Electricity Networks team
Department of Energy and Climate Change
3 Whitehall Place
London SW1A 2HD
gridaccess@decc.gsi.gov.uk

Improving Grid Access

The Renewable Energy Association is pleased to be able to respond to this consultation. As you are aware our members work on all types of renewable power and heat projects and we have been active in the debate over access to the transmission system for several years now. We are pleased that the Government is determined to resolve what has been, along with planning, the major obstacle to timely implementation of many of our members' projects and with that a threat to the Government's target for renewable energy and CO_2 emission reduction.

As a representative organisation the means that we have used to ascertain our members' views is as follows. Having drawn their attention to the consultation we drafted a response which was circulated to members for comment. We then revised this response and circulated it to members again following the issue of additional information on enabling works. Following this the final response was produced.

Summary of Response

We welcome confirmation that connect and manage is the way forward. Whilst the majority of our membership favours uniform BSUoS charges as decided some will have reservations but we can be sure that the subject of transmission charging in general will be in the spotlight over the next year, with much attention being devoted to the development of charging arrangements for intermittent generation.

We have some reservations on the use of derogations from the SQSS to enable Connect and Manage rather than modifying the SQSS itself so that derogations should not prove routinely necessary. We think that further explanation is still required of the definition of enabling works as we anticipate that this is the area over which there will be most friction in the future. We do not think that user commitment post commissioning should be extended any further than proposed and see pre commissioning user commitment as something that needs further development which we understand that NGC is doing through the normal industry governance process.

We have not felt able to comment on the detail of the license and code drafting changes in the time available.

Consultation questions

1. Do you agree that the proposed model for reforming grid access would best meet the Government's objectives for this reform? We would particularly welcome comments on: • The definition of 'enabling works';

We are broadly satisfied that the proposed model is a satisfactory way forward and would meet the Government's objectives. We think that in order to answer the question on enabling works further detail is needed. For example the definition of maximum enabling works involves those circuits required to connect the connection site to a MITS substation. What happens in circumstances when the connection site is connected via one or more circuits to a MITS substation and one or more circuits to another substation? Would the fact that it was connected to a MITS substation via say two circuits and another substation that was not a MITS substation via other circuits automatically mean that the enabling works were satisfied? The list in 13.2.4 may need some refinement for example "avoiding any adverse impact on other users" could be used not to allow connect and manage if constraint costs might be increased or even if it might take market share away from other generators. Complying with the minimum design requirements under the Grid Code Planning Code 6.1 requires that the License Standards are applied by the Transmission Companies (basically the SQSS). It could be argued therefore that if the SQSS could not be complied with 13.2.4.5 of the proposed CUSC was not being complied with and a derogation against the SQSS could not be sought. In general it is not clear how 13.2.2 of the proposed CUSC interacts with 13.2.4. For example if there is a connection to a MITS substation (hence completing the maximum enabling works) but there are fault level issues, what is the position? We do not think that the further information published on enabling works answers these questions.

• The process for derogation from the SQSS;

We are not happy that what is being proposed is the best solution. Leaving aside the oddity of NGC granting itself (and the Scottish TOs) derogations we do not think that having derogations from SQSS as the norm is the right way to go. The SQSS should rather itself be amended to allow connection of generation once the enabling works have been carried out, but still leaving in place the obligation to complete the wider works. Most of the wording that would be required to do this in the SQSS has already been drafted for the license / CUSC and putting the allowance of connection before the wider works are completed into the SQSS should allow simplification of the drafting of other documents.

• The extension of user commitment;

We did not support any extension of user commitment and certainly would not wish to see post connection user commitment extended any further than is proposed. We are conscious that arrangements for pre connection user commitment need to be reviewed and that this will be taken forward through the normal industry governance process.

• The transition arrangements.

We think that the transition arrangements are satisfactory.

2. Do the proposed licence and code amendments deliver the policy aim?

We have not reviewed the wording of the proposed changes.

3. Do you think there are any other changes to industry codes and licences or any other actions needed to implement the model?

Our preferred method of implementing the arrangements would involve modification of the SQSS to avoid the need for routine derogation.

For the avoidance of doubt we would not wish to see the implementation of the enduring connect and manage arrangements delayed. We have suggested some areas where we think improvements could be made but we would not wish to see consideration of these improvements lead to a delay implementation of the enduring arrangements with the certainty and stability that that would bring. Please let us know if you would like to discuss any aspects of this letter further.

Yours sincerely,

Gaynor Hartnell

Chief Executive