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Dear Mark,

GB SQSS Consultation Response by Electricity North West (ENW)

Thank you for the opportunity to comment of the recent GB SQSS fundamental review consultation document. The range of issues which has been addressed by the various review groups is necessarily wide and clearly not all are especially relevant to us as a Distribution Network Operator and Distribution Licensee. However, we are broadly comfortable with the principles of the proposals as they are outlined in your documentation and support the phased approach to the review that you are proposing.

It is largely those issues considered within Working Group 2 – Transmission Entry/Exit that are most of relevance to ENW. We have maintained a view since the mid 1990s that it was unfortunate that the creation of the SQSS and the abandonment of P2/5 by NGET has inevitably resulted in subtle misalignment between the interface requirements. Given this, we would welcome any efforts to re-align SQSS with P2/6 in an effort to address the issues raised in your consultation paper. Additionally at this time it is also worth considering the potential implications for planning standards of the introduction of Smart Grids. Clearly the resource implications of such an exercise are considerable, and careful structuring will be necessary if anything useful is to be delivered in a reasonable timescale.

We are broadly satisfied with your interim proposals for addressing the issues considered within WG2. However, with respect to Exporting Grid Supply Points (GSPs), it is our view that the network security considerations pertaining to GSPs ought to be based upon the logic within Engineering Recommendation P2/6 ie determined by the P2/6 Group Demand within the GSP. We are happy to continue to liaise with your operational colleagues to ensure that both the data exchange process of B/07 and week 24 meet your requirements.

Yours sincerely,

Mike Kay Engineering & Planning Director