

AMENDMENT REPORT

STC Proposed Amendment CA036

Activities in support of the preparation of the Offshore Development Information Statement

The purpose of this report is to assist the Authority in their decision of whether to implement Amendment Proposal CA036

Amendment Ref	CA036
Issue	2.0
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Prepared by	STC Committee

I DOCUMENT CONTROL**a STC Document Control**

Version	Date	Author	Change Reference
0.1	08/06/10	STC Committee	Draft for STC Committee
1.0	23/06/10	STC Committee	Proposed Amendment for industry Consultation
2.0	29/09/10	STC Committee	Formal version for submission to Authority

b Document Location

Nation Grid Website:

<http://www.nationalgrid.com/uk/Electricity/Codes/sotocode/>

c Distribution

Name	Organisation
The Gas and Electricity Markets Authority	Ofgem
STC Parties	Various
Interested Parties	Various
Core Industry Document Owners	Various
National Grid Industry Information Website	

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1.0 SUMMARY AND RECOMMENDATION

- 1.1 STC Amendment Proposal CA036 proposes to include provisions which will describe what activities are required from the Transmission Owners to support National Grid Electricity Transmission Company (NGET) in its preparation of the Offshore Development Information Statement (Statement).
- 1.2 STC Amendment Proposal CA036 was proposed by NGET and submitted for consideration to the STC Committee meeting on 27th April 2010.
- 1.3 The STC Committee has discussed the Proposed Amendment CA036 and has recommended that it proceeds to the Assessment and Report Phase.

STC Committee Recommendation

- 1.4 The STC Committee recommends that STC Amendment Proposal CA036 to be approved for implementation.
- 1.5 Should the Authority approve STC Amendment Proposal CA036, it is recommended that the STC be modified 5 days after the Authority decision.

2.0 PURPOSE AND SCOPE OF THE REPORT

- 2.1 This Amendment Report has been prepared and issued by the STC Committee under the rules and procedures specified in the System Operator – Transmission Owner Code.
- 2.2 The Offshore Electricity Transmission regulatory arrangements extended the (GB) electricity transmission system to cover offshore waters (National Electricity Transmission System (NETS)). This increase in scope, of the electricity transmission system, has emphasised the importance of 'developing an efficient, coordinated and economic system of electricity transmission'. The requirement to publish an annual Statement is to facilitate the achievement of this objective.
- 2.3 STC Amendment Proposal CA036 seeks to put in place provisions which will describe what activities are required from the Transmission Owners to support NGET in the preparation of the Statement.
- 2.4 The STC is currently silent on the collaboration process between NGET and the Transmission Owners regarding the production and publication of the Statement.
- 2.5 Further to the submission of Amendment Proposal CA036 (see Annex 1) this document is addressed and furnished to persons who have a relevant interest in the Proposed Amendment and invites views upon the Amendment Proposal CA036.
- 2.6 This document outlines the nature of the STC changes that are proposed. It incorporates the STC parties' provisional recommendations to the Authority concerning the Amendment.
- 2.7 This Amendment Report has been prepared in accordance with the terms of the STC. An electronic copy can be found on the National Grid website, at <http://www.nationalgrid.com/uk/Electricity/Codes/sotocode/>.

3.0 THE PROPOSED AMENDMENT

- 3.1 Offshore power generation will play an important part in meeting the UK's renewable energy and carbon emission targets, improving energy security by 2020 and afterwards towards 2050. The annual publication of the Statement aims to help facilitate the development of an efficient, coordinated and economical system of electricity transmission in offshore waters by including a wide range of information relating to the possible development of both the offshore and onshore transmission systems.
- 3.2 The information contained in the Statement provides an illustration of how the NETS may be developed in offshore waters against the future generation and demand backgrounds (future scenarios). The Statement also contains information regarding the potential corresponding onshore reinforcements which may be required to facilitate the distribution of the offshore generation.
- 3.3 The future scenarios utilised in the Statement do not represent the contracted position of users of the NETS (as presented in Seven Year Statement) nor the investment planning programme(s) of the Transmission Owner(s). Given the uncertainties in predicting how the electricity network will be developed in the future, the future scenarios represents a range of credible backgrounds against which the potential future development of the electricity network may be evaluated by industry participants.
- 3.4 STC Amendment Proposal CA036 seeks to put in place provisions which will describe what activities are required from the Transmission Owners to support NGET in its preparation of the Statement. It will require the close collaboration between NGET and the Transmission Owners. It will also require agreement of the tasks, timescales and responsibilities that will apply to NGET and the Transmission Owners regarding the preparation of the Statement.
- 3.5 For the Transmission Owners to assist NGET with the preparation of the Statement, it will require an exchange of data not currently permitted under the existing STC provisions for data exchange.
- 3.6 The Transmission Owners will require access to the detailed supporting data for each of the future scenarios which will be included in that particular year's Statement. This information will be in greater detail than that which is published in the Statement (data is aggregated and categorised via fuel type and/or offshore development announcements).
- 3.7 The information exchanged will, for each future scenario, include the demand and generation background for each year of the study period (which is relevant for that year's Statement). The generation background will include the name, location and the size of the generator (as specified by the Transmission Entry Capacity (TEC)), listed in likely order of operation.
- 3.8 The current data exchange provisions for the preparation of the Seven Year Statement and for Investment Planning do not permit the data exchange necessary for the annual preparation of the Statement as the information is restricted to a pre-defined time period which is not applicable or appropriate for the future looking Statement.
- 3.9 Furthermore the information which will be exchanged will not be at the same level which is provided for the Seven Year Statement and Investment Planning which includes technical data provided by Users of the Grid Code.

- 3.10 The information will be included in the future scenarios which will be at the level of detail which is provided in the Transmission Entry Capacity (TEC) register (available on National Grid's website) i.e. name, location, type and the TEC size of the generation project.
- 3.11 The involvement of the Transmission Owners in the preparation of the Statement will enable the provision of a more detailed, comprehensive analysis of the potential development of the NETS to that which is currently provided in the Statement due to the detailed knowledge which the Transmission Owners have on their transmission area (and may not necessarily be available to NGET (acting in its role as National Electricity Transmission System Operator)).
- 3.12 The inclusion of this more enhanced information will be of benefit to industry participants who have indicated that the Statement is a key document in facilitating the development of the NETS in offshore waters.

4.0 ALTERNATIVE AMENDMENTS

- 4.1 No Alternative Amendments to CA036 were submitted.

5.0 EVALUATION PHASE

- 5.1 The STC Committee considered that CA036 should be referred directly to the Assessment and Report Phase. Both the STC Committee and Joint Planning Committee (JPC) were satisfied that the proposal represented an extension to existing work currently undertaken for the SYS and Investment Planning. The STC Committee and JPC were in agreement that the proposals would not introduce significant new arrangements which would necessitate a formal, more detailed, evaluation of the Amendment Proposal.

6.0 STC PARTIES' ASSESSMENTS

- 6.1 This section contains a summary of the views and representations made by STC Parties during the Assessment Phase in respect of the Proposed Amendments, in accordance with Section B, Paragraph 7.2.5.2 of the STC.

National Grid View

- 6.2 National Grid is supportive of Amendment Proposal CA036, and has carried out an Assessment of the Proposed Amendment.
- 6.3 The implementation of CA036 would not have any physical impact on National Grid's Transmission System or require changes to the IS Systems. No additional works or monies would be required to implement the proposed change.

Scottish Hydro-Electric Transmission Limited (SHETL) View

- 6.4 Scottish Hydro-Electric Transmission Limited (SHETL) is supportive of Amendment Proposal CA036, and has carried out an Assessment of the Proposed Amendment.

- 6.5 The implementation of CA036 would not have any physical impact on SHETL's Transmission System or require changes to the IS Systems. No additional works or monies would be required to implement the proposed change.

SP Transmission Limited (SPT) View

- 6.6 SPT is supportive of Amendment Proposal CA036, and have completed an Assessment on the Proposed Amendment.
- 6.7 The implementation of CA036 would not have any physical impact on SPT System(s) or require changes to IS systems. No additional works or monies would be required to implement the proposed change.

7.0 IMPACT ON THE STC/STCPs

- 7.1 The Proposed Amendment will require the addition of a new paragraph in Section D (Planning Co-ordination), Part One (Transmission Planning) of the STC which will specify the programme of activities required to be undertaken by the Transmission Owner in to support NGET in the preparation of the Statement. The table of contents will also be updated to reflect the inclusion of the new paragraph in Section D (Planning Co-ordination), Part One (Transmission Planning).
- 7.2 The Proposed Amendment will require the addition of a new provision in paragraph 2 of Schedule 3 which will specify the data exchange necessary to facilitate the preparation of the Statement.
- 7.3 The Proposed Amendment will require amendments to Section H (Dispute Resolution), paragraph 4 such that it allows the resolution of any disputes regarding the preparation of the Statement.
- 7.4 The Proposed Amendment will require amendments Section J (Interpretation and Definitions) such that it provides the users with an explanation of the terminology associated with the preparation of the Statement.
- 7.5 The text required to give effect to the Proposed Amendment is attached in annex 2.
- 7.6 In the event of Proposed Amendment being approved and subsequently implemented within the STC, it will require the creation of a new STC Procedure (STCP). The STCP will describe in greater detail the process for producing and publishing the Statement. The procedure will define the tasks, formal documentation, interface requirements, timescales and responsibilities that apply to NGET and the Transmission Owners.

8.0 IMPACT ON CORE INDUSTRY DOCUMENTS

- 8.1 The Grid Code currently specifies which technical data provided by Users can be exchanged with the Transmission Owners (with corresponding provisions within the STC).
- 8.2 The Proposed Amendment will not require a consequential Grid Code change as the information which will be provided to the Transmission Owners i.e. name, location and size of the generation (as specified by its TEC), is not technical user data as defined by the Grid Code.

- 8.3 The information which will be included in the future scenarios (and therefore exchanged with the Transmission Owners) is that which is provided by a generator when they complete (and submit) a CUSC connection application to NGET and which is made publicly available via the TEC register (after the appropriate Bilateral Agreement has been signed by the relevant parties).
- 8.4 Therefore the Proposed Amendment would have no impact on Core Industry Documents or Industry documentation or require any changes to computer systems established under Core Industry Documents.

9.0 STC COMMITTEE VIEWS & RECOMMENDATION

- 9.1 The STC Committee believes that amendment of the STC on the basis of CA036 would better facilitate achievement of the following applicable STC objectives detailed below:

- (b) development, maintenance and operation of an efficient, economical coordinated system of electricity transmission;

in so far as the Statement will contained a co-ordinated approach (developed, discussed and agreed by the Transmission Owners) regarding the potential future development of the NETS in offshore waters;

- (c) facilitating effective competition in the generation and supply of electricity and (so far as consistent therewithin) facilitating such competition in the distribution of electricity ;

in so far as the Statement will contain a more detailed comprehensive analysis of the potential development of the NETS in offshore waters which will be of benefit to industry participants (as the Statement is publicly available via National Grid's website); and

- (d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees;

in so far as the Statement will contain relevant information which would assist with the identification any potential interactions between the transmission licensees which would impinge on the security and quality of supply and safe operation of the NETS in the event of the electricity network being developed as depicted by the Statement.

- 9.2 The STC Committee believe that CA036 has a cost neutral environmental impact as it is purely an administrative process that is being proposed.
- 9.3 The STC Committee therefore recommends that the Authority should approve Amendment Proposal CA036 for implementation.

10.0 IMPLEMENTATION AND TIMESCALES

- 10.1 Should the Authority approve Amendment Proposals CA036, it is recommended that the STC be modified 5 business days after the Authority's decision.

11.0 VIEWS AND REPRESENTATIONS

- 11.1 Views have been invited from Industry parties upon the Proposed Amendment contained within this Proposed Amendment Report.
- 11.2 The STC Committee received two responses following the publication of the Proposed Amendment Report (version 1.0 of this document). The following table provides an overview of the representations, and copies of the representations are attached in Annex 3 of this document.

Reference	Company	Summary of Comments
CA036-AR-01	EDF Energy plc	EDF Energy is generally supportive of the Proposed Amendment CA036. EDF Energy indicated that it would be useful to know more about the form and governance of the new STC Procedure which would accompany this Proposed Amendment.
CA036-AR-02	Transmission Capital Limited	Transmission Capital is supportive of the Proposed Amendment CA036.

- 11.3 The STCP which will accompany this Proposed Amendment will be developed after the Authority's determination (on the Proposed Amendment) has been announced. The proposed STCP will be available on National Grid's website when it has been submitted to the STC Committee for discussion and approval.

Annex 1 - Amendment Proposal Form**STC Amendment Proposal Form****CA036**

<p>1. <u>Title of Amendment Proposal</u> Activities in support of the preparation of the Offshore Development Information Statement.</p>
<p>2. <u>Description of the Proposed Amendment</u> <i>(mandatory field)</i> A proposed amendment to the STC to clarify what activities are required from the Transmission Owners to support NGET in its preparation of the Offshore Development Information Statement.</p>
<p>3. <u>Description of Issue or Defect that Proposed Amendment seeks to Address</u> <i>(mandatory field)</i> The introduction of the new regulatory arrangements for the Offshore Electricity Transmission (Go-Active: 24th June 2009) extended the (GB) electricity transmission system to cover offshore waters. This increase in scope, of the electricity transmission system, has emphasised the importance of 'developing an efficient, coordinated and economic system of electricity transmission'. The requirement to publish an annual Offshore Development Information Statement (Statement) is to facilitate the achievement of this objective.</p> <p>The proposed amendment seeks to put in place provisions which will describe what activities are required from the Transmission Owners to support NGET in its preparation of the Offshore Development Information Statement. This will require close collaboration between NGET and the Transmission Owners, potentially similar to the arrangements which are in place for the annual publication of the Seven Year Statement. The STC is currently silent on the collaboration process between NGET and the Transmission Owners regarding the production and publication of the Offshore Development Information Statement.</p> <p>The amendment will be accompanied by a STC Procedure which will describe in greater detail the process for producing and publishing the Offshore Development Information Statement. The procedure will define the tasks, formal documentation, interface requirements, timescales and responsibilities that apply to NGET and the Transmission Owners.</p> <p>For the avoidance of doubt:</p> <ul style="list-style-type: none"> - the provisions will be applicable to both onshore and offshore Transmission Owners - the Transmission Owners will continue to develop the detailed connection designs in accordance with the CUSC connection process
<p>4. <u>Impact on the STC</u> <i>(information should be given where possible)</i></p> <ul style="list-style-type: none"> - Amendments to Section D (Planning Co-ordination), Part One (Transmission Planning) - Amendments to Section H (Dispute Resolution) - Amendments to Section J (Interpretation and Definitions) - Amendments to Schedule 3 (Information and Data Exchange Specification)
<p>5. <u>Impact on other frameworks e.g. CUSC, BSC</u> <i>(information should be given where possible)</i> None</p>
<p>6. <u>Impact on Core Industry Documentation</u> <i>(information should be given where possible)</i> None</p>
<p>7. <u>Impact on Computer Systems and Processes used by STC Parties</u> <i>(information should be given where possible)</i> None</p>
<p>8. <u>Details of any Related Modifications to Other Industry Codes</u> <i>(where known)</i> Not Applicable</p>

9. Justification for Proposed Amendment with Reference to Applicable STC Objectives (mandatory field)	
Amending the STC in this manner would mean that the following objectives are better facilitated:	
<p>(b) development, maintenance and operation of efficient, economical and co-ordinated system of electricity transmission;</p> <p>(c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and</p> <p>(d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees.</p>	
Details of Proposer Organisation's Name	National Grid Electricity Transmission plc
<i>Capacity in which the Amendment is being proposed</i> (i.e. STC Party or other Party as designated by the Authority pursuant to STC section B7.2.2.1 (b))	STC Party
Details of Proposer's Representative Name Organisation Telephone Number Email Address	Amanda May National Grid Electricity Transmission plc 01926 655334 Amanda.May@uk.ngrid.com
Details of Representative's Alternate Name Organisation Telephone Number Email Address	Bec Thornton National Grid Electricity Transmission plc 01926 656386 Bec.Thornton@uk.ngrid.com
Attachments (Yes/No): Yes Supporting (draft) legal changes	

Notes:

- Those wishing to propose an Amendment to the STC should do so by filling in this "Amendment Proposal Form" that is based on the provisions contained in Section 7.2 of the STC.
- The Committee Secretary will check that the form has been completed, in accordance with the requirements of the STC, prior to submitting it to the Committee. If the Committee Secretary accepts the Amendment Proposal form as complete, then she/he will write back to the Proposer informing them of the reference number for the Amendment Proposal and the date on which the Committee will consider the Proposal. If, in the opinion of the Committee Secretary, the form fails to provide the information required in the STC, then he/she may reject the Proposal. The Committee Secretary will inform the Proposer of the rejection and report the matter to the Committee at their next meeting. The Committee can reverse the Committee Secretary's decision and if this happens the Committee Secretary will inform the Proposer.

The completed form should be returned to:

STC Committee Secretary
Commercial Frameworks
National Grid Company plc
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA
Or via e-mail to: STCTeam@uk.ngrid.com

Annex 2 – Proposed Text to modify STC

TABLE OF CONTENTS

Amend the Table of Contents as follows:

SECTION D: PLANNING CO-ORDINATION

Part One: Transmission Planning

1. Introduction
2. Transmission Planning
3. Default Planning Boundary
4. Seven Year Statement
5. Offshore Development Information Statement

SECTION D (PLANNING CO-ORDINATION)

Insert a new paragraph (1.1.4) into Section D (Planning Co-ordination), Part One (Transmission Planning) and amendment paragraphs 1.1.2 and 1.1.3 as follows:

PART ONE: TRANSMISSION PLANNING

1. INTRODUCTION

- 1.1 This Section D, Part One deals with the planning and development of Transmission Owners' Transmission Systems and relevant parts of the National Electricity Transmission System on a co-ordinated basis, and sets out:
 - 1.1.1 the process for Transmission Owners to develop and implement Transmission Investment Plans in respect of their Transmission Systems and NGET to develop and implement NGET Investment Plans;
 - 1.1.2 the general principles for identifying the Default Planning Boundary at Connection Sites for the purpose of planning and development; ~~and~~
 - 1.1.3 provision for the Parties to co-operate in relation to the preparation by NGET of the Seven Year Statement; ~~and-~~
 - 1.1.4 provision for the Parties to co-operate in relation to the preparation by NGET of the Offshore Development Information Statement.

Insert a new paragraph into Section D (Planning Co-ordination), Part One (Transmission Planning) as follows:

5. OFFSHORE DEVELOPMENT INFORMATION STATEMENT

5.1 Preparation of Offshore Development Information Statement

- 5.1.1 NGET shall, prior to seeking the approval of the Authority for a form of the Offshore Development Information Statement pursuant to Special Condition C4 (Role of the national electricity transmission system operator area located in offshore water) of its Transmission Licence, consult with each Transmission Owner.
- 5.1.2 NGET shall agree with each Transmission Owner a programme of activities required to be undertaken by that Transmission Owner in order to support NGET in NGET's preparation of each Offshore Development Information Statement ("**ODIS Programme**") and that Transmission Owner shall carry out such activities as are specified in the ODIS Programme. Any failure to agree a ODIS Programme may be referred as a Dispute to the Authority in accordance with Section H, paragraph 4.1.
- 5.1.3 In the event that NGET and a Transmission Owner fail to agree a ODIS Programme, or any part therefore, then, subject to the determination of any Dispute referred to the Authority pursuant to sub-paragraph 5.1.2, the Transmission Owner shall carry out such ODIS Programme as NGET may specify.
- 5.1.4 NGET shall provide to each Transmission Owner those parts of the initial draft text of each Offshore Development Information Statement as are of relevance to it and shall liaise with each of them in order to agree any amendments to the initial draft text of the Offshore Development Information Statement requested by a Transmission Owner. Any failure to agree such amendments may be referred as a Dispute to the Authority in accordance with Section H, paragraph 4.1.
- 5.1.5 In the event that NGET and a Transmission Owner fail to agree any amendments to the initial draft text of the Offshore Development Information Statement then subject to the determination of any Disputes referred to the Authority pursuant to sub-paragraph 5.1.4, NGET' s proposals in respect of such amendments shall prevail.
- 5.1.6 For the avoidance of doubt, nothing in this paragraph 5.1. shall preclude the Parties from progressing activities pursuant to sub-paragraphs 5.1.1, 5.1.2 and 5.1.4 at the same time.

SECTION H (DISPUTES)

Amendment Section H (Disputes), Paragraph 4 (Referrals to the Authority) as follows:

4. REFERRALS TO THE AUTHORITY

- 4.3 In addition to those matters falling under paragraph 4.4, the following matters shall constitute a Dispute referable to the Authority under the Code:
 - 4.3.101 a failure to agree amendments to draft text of a Seven Year Statement pursuant to Section D, Part One, sub-paragraph 4.1.4;
 - 4.3.124 a failure to agree an ODIS Programme or any part therefore pursuant to Section D, Part One, sub-paragraph 5.1.2
 - 4.3.132 a failure to agree amendments to the draft text of an Offshore Development Information Statement pursuant to Section D, Part One, sub-paragraph 5.1.4

- 4.3.142 a dispute pursuant to Section E, paragraph 4.1;
- 4.3.153 a failure to agree under Section G, sub-paragraphs 6.1.1 or 6.1.2; and
- 4.3.164 a dispute as to whether a matter falling under paragraph 4.4 materially and adversely affects a Dispute Party's ability to develop and maintain an efficient, co-ordinated and economical system of electricity in the National Electricity Transmission System Operator Area for the purpose of determining such Dispute Party's entitlement to refer a matter to the Authority under paragraph 4.4.

SCHEDULE 3

Insert a new provision into Schedule 3 (Information and Data Exchange Specification), Paragraph 2.1.1 as follows:

2. Information and Data Exchange Other than During the Transition Period

2.1 General Principles

2.1.1 For the purposes of this Schedule Three:

- (j) **“ODIS Scenarios”** means the forecast future generation (listed in order of likely operation) and Demand backgrounds to be provided by NGET which are to be utilised for the purposes of the development of the Offshore Development Information Statement.

Insert a new provision into Schedule 3 (Information and Data Exchange Specification), Paragraph 2 (Information and Data Exchange Other than During the Transition) as follows:

2.7 Offshore Development Information Statement Data

2.7.1 A Party may Disclose to a Transmission Owner:

- (a) where the Disclosing Party is NGET the ODIS Scenarios; and
- (b) the results of its assessments undertaken in connection with the development of the Offshore Development Information Statement which will affect the assessments undertaken by another Transmission Owner in respect of its Transmission System.

SECTION J (INTERPRETATION AND DEFINITIONS)

Insert the following new definitions (in alphabetical order) into Section J (Interpretation and Definitions), Paragraph 3:

- “ODIS Programme”** as defined in Section D, Part One, sub-paragraph 5.1.2;
- “Offshore Development Information Statement”** the annual statement prepared by NGET in accordance with Section D, Part One, paragraph 5 and Special Condition C4 of its Transmission Licence;
- “Special Condition”** a special condition of a Transmission Licence;

Annex 3 – Copies of Comments received on the Proposed Amendment Report

[To be completed when comments are received]

This Annex includes copies of any representations received following circulation of the Proposed Amendment Report (circulated on 23rd June 2010, requesting comments by close of business on 23rd July 2010).

Representations were received from the following parties:

No.	Company	File Number
1	EDF Energy plc	CA036-AR-01
2	Transmission Capital Limited	CA036-AR-02

No.	Company	File Number
1	EDF Energy plc	CA036-AR-01



To Kabir.Ali@uk.ngrid.com

23 July 2010

Dear Kabir,

STC Proposed Amendment CA036 – Activities in support of the preparation of the Offshore Development Information Statement.

EDF Energy is pleased to respond to the consultation on STC change proposal CA036.

We note that CA036 proposes that other transmission entities provide data to National Grid (NG) allowing NG to meet its new obligation to publish the Offshore Development Information Statement. This is a new annual document loosely comparable with NG's Seven Year Statement for offshore generation/transmission.

It would be useful to know more about the form and governance of the STC procedure that will define the data to be exchanged and the form and resolution of the published statement. However, we generally support CA036, as we agree that the change would better facilitate three objectives: (b) development, maintenance and operation of efficient, economical and co-ordinated system of electricity transmission; (c) facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and (d) protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees.

We agree that the change does not need a long lead-in time, it is therefore reasonable for the STC to be modified 5 days after any approval decision from Ofgem.

Yours sincerely,

Paul Mott
Senior Trading and Transmission Advisor
Corporate Policy & Regulation
EDF Energy



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EDF Energy plc
Registered in England and Wales
Registered No. 2668852
Registered office: 40 Grosvenor Place,
Victoria, London SW1X 7BN

No.	Company	File Number
2	Transmission Capital Limited	CA036-AR-02



Kabir Ali,
National Grid
Gallows Hill
Warwick
CV34 6DA

23 July 2010

Dear Kabir

STC Proposed Amendment CA036 - Activities in support of the preparation of the Offshore Development Information Statement

We welcome the opportunity to take part in this consultation.

Transmission Capital Limited has been established to manage investment in electricity transmission assets. We have extensive onshore and offshore transmission experience gained over more than a decade of developing, procuring, constructing and operating electricity projects, including onshore and offshore transmission and wind projects. Initially we are focussed on the opportunity in the UK provided by the competitive arrangements recently introduced for the provision of offshore electricity transmission. With Transmission Capital as the lead partner, we have formed a consortium Transmission Capital Partners that has recently tendered for all 9 of the projects in the first transitional offshore transmission tender round. We very much hope to be named as preferred bidder for one or more of these projects in the near future.

We strongly support the proposed STC amendment CA036, and believe that the resources and experience of the OFTOs and companies such as Transmission Capital will be invaluable in this area.

We would welcome the opportunity to contribute further to the debate in this area. If you wish to discuss any of the points raised in the letter then please feel free to contact me.

Yours sincerely

Dr Chris Veal
Managing Director

Registered in England No. 6769968