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1st February 2011

Dear Tom

STC Proposed Amendment CA042 - Offshore Transmission System Compliance & Testing

Thank you for the invitation to provide comments on the above STC consultation dated 5th January 2011. The following response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Supply & Trading GmbH and RWE Npower Renewables Limited, the UK subsidiary of RWE Innogy GmbH.

CA042 proposes that STC Section K be amended to include an obligation on the OFTO to provide compliance information to NGET and also to carry out compliance tests as requested by NGET. Whilst we recognise and support the need for the OFTO's network to be compliant with the requirements of the STC, we are concerned that certain compliance tests may have an adverse impact on the offshore generator. We therefore request that the proposed text in Clause 8 be amended to clarify that such tests requested by NGET must be reasonable and necessary and, where they may have an effect on the offshore generator, be discussed and agreed with the offshore generator beforehand.

We note that STCP 19-5 is currently being developed in parallel with this proposed amendment to STC Section K. We believe it is appropriate that the requirement to discuss proposed tests with the offshore generator be specified within the Section K but it may also be appropriate to include this requirement within STCP 19-5. In addition, it may be appropriate to recognise the generator build option within STCP 19-5 and the role of the offshore generator in this compliance process.

I trust that you will find the above comments helpful. If you wish to discuss any matters further please do not hesitate to contact me.

Yours sincerely

By e-mail

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