

AMENDMENT REPORT

STC Proposed Amendment CA025

Amendment to STC Regarding Obligations in Connection Site Specification

*The purpose of this report is to assist the Authority
in their decision of whether to implement
Amendment Proposal CA025*

Amendment Ref	CA025
Issue	2.0
Date of Issue	20 th June 2007
Prepared by	STC Committee

I DOCUMENT CONTROL**a STC Document Control**

Version	Date	Author	Change Reference
0.1	13/03/07	STC Committee	Draft for STC Committee
1.0	23/05/07	STC Committee	Draft for Industry Consultation
2.0	20/06/07	STC Committee	Formal Version for submission to Authority

b Document Location

National 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 CA025 seeks to amend Section D, Part One and Part Two of the STC to such that Transmission Owners submit to National Grid any revised Connection Site Specifications.
- 1.2 Amendment Proposal CA025 was proposed by National Grid Electricity Transmission plc (“National Grid”) and submitted for consideration to the STC Committee Meeting on Tuesday, 20th February 2007. The Committee recommended that it proceed directly to the Assessment and Report Phase.

STC Committee Recommendation

- 1.3 The STC Committee recommends that CA025 be approved for implementation.
- 1.4 Should the Authority approve CA025, the STC Committee recommends that the STC be modified 5 business days after the Authority’s decision.

2.0 PURPOSE AND INTRODUCTION

- 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. It addresses issues relating to the revision of Connection Site Specification and the submission of such revisions to National Grid.
- 2.2 Further to the submission of Amendment Proposal CA025 (see Annex 1), and the subsequent wider industry consultation that was undertaken by the STC Committee, this document is addressed and furnished to the Gas and Electricity Markets Authority (“the Authority”) in order to assist them in their decision as to whether to implement Amendment Proposal CA025.
- 2.3 This document outlines the nature of the STC changes that are proposed. It incorporates the STC Committee’s provisional recommendation concerning the Amendment.
- 2.4 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 Section D, Part One of the STC sets out the obligation for each Transmission Owner to have and maintain a Connection Site Specification for each Connection Site.
- 3.2 A Connection Site is where there is User Equipment and Transmission Connection Assets to connect that User to the GB Transmission System.
- 3.3 A Connection Site Specification should, amongst other things, contain: a description of the Transmission Connection Assets at the Connection Site, a clear identification of the boundary between Transmission Connection Assets and User Assets and also a description of the technical design and operational criteria which the Transmission Owner had assumed to apply to User's Equipment at the Connection Site.
- 3.4 To enable National Grid to operate the GB Transmission System, it must have accurate information regarding a Connection Site. To this end, any amendments to a Connection Site Specification must be submitted to National Grid by the Transmission Owner.
- 3.5 It is therefore proposed to amend the STC to ensure that any amendments to a Connection Site Specification are submitted to National Grid prior to an Energisation Notice or Interim Operational Notification being issued to a User.
- 3.6 These proposals would therefore result in the inclusion of additional words in Section D, Part One, Paragraph 2.6, and an additional Paragraph 11 in Section D, Part Two.
- 3.7 The final proposed legal text to give effect to Amendment Proposal CA025 is attached as Annex 2 of this document.

4.0 ALTERNATIVE AMENDMENTS

- 4.1 No Alternative Amendments to CA025 were submitted.

5.0 EVALUATION PHASE

- 5.1 The STC Committee considered that CA025 should be referred directly to the Assessment and Report Phase, and that an Evaluation Phase was not therefore required. In arriving to this decision, the STC Committee noted that the proposal had been discussed and agreed by the Joint Planning Committee (JPC).

6.0 STC PARTIES' ASSESSMENTS

- 6.1 This section sets out the analysis and impact assessment ("Assessment") provided by STC Parties during the Assessment and Report Phase in respect of the Proposed Amendment, in accordance with Section B, Paragraph 7.2.5.2 of the STC.

National Grid Assessment

- 6.2 National Grid is supportive of Amendment Proposal CA025, and has carried out an Assessment on the Proposed Amendment.

- 6.3 The implementation of CA025 would not have any physical impact on National Grid's Transmission System or require changes to IS systems. No additional works or monies would be required to implement the proposed change.

Scottish Hydro-Electric Transmission Limited ("SHETL") Assessment

- 6.4 SHETL is supportive of Amendment Proposal CA025, and has carried out an Assessment on the Proposed Amendment.
- 6.5 The implementation of CA025 would not have any physical impact on SHETL's Transmission System or require changes to IS systems. No additional works or monies would be required to implement the proposed change.

Scottish Power Transmission Limited ("SPTL") Assessment

- 6.6 SPTL is supportive of the Amendment Proposal CA025 and has carried out a relevant assessment which confirms that there is no physical impact to SP Transmission's network, nor are there any changes required to existing IT systems. It is not expected that any additional works or monies would be required to implement the proposed amendment.

7.0 IMPACT ON THE STC

- 7.1 The Proposed Amendment would require the amendment of Section D (Planning Co-ordination), Part One (Transmission Planning), paragraph 2.6 such that when a Transmission Owner has any revised information regarding the Connection Site Specification then it shall submit a revised Connection Site Specification to National Grid.
- 7.2 The Proposed Amendment would require the addition of a new paragraph 11 in Section D, Part Two (Construction) which would necessitate the Transmission Owners to submit a new or revised Connection Site Specification to National Grid prior to the Completion Date of a project.
- 7.2 The text required to give effect to the Proposed Amendment is contained as Annex 2 of this document.

8.0 IMPACT ON CORE INDUSTRY DOCUMENTS

- 8.1 The Proposed Amendment would have no impact on Core Industry Documents or other industry documentation, or require any changes to computer systems established under Core Industry Documents.

9.0 STC COMMITTEE VIEWS AND RECOMMENDATION

- 9.1 The STC Committee believe that amendment of the STC on the basis that on CA025 would better facilitate achievement of the applicable STC objectives, in particular applicable STC objective (b) in that the maintenance and communication of accurate Connection Site information would enable licensees to develop, maintain and operate an efficient, economical and coordinated system of electricity transmission.

- 9.2 The implementation of such provisions would also better facilitate achievement of applicable STC objective (a) as they would enable the efficient discharge by Scottish Transmission Owners of the obligations imposed upon them by their transmission licences and the Act.
- 9.4 The STC Committee therefore recommends that the Authority should approve Amendment Proposal CA025 for implementation.

10.0 IMPLEMENTATION AND TIMESCALES

- 10.1 Should the Authority approve Amendment Proposal CA025, it is recommended that the STC be modified 5 business days after the Authority's decision.

11.0 INDUSTRY VIEWS AND REPRESENTATIONS

- 11.1 Views were invited from industry parties upon the Proposed Amendment outlined in this 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 a copy of the representations are attached in Annex 3 of this document.

Reference	Company	Summary of Comments
CA025-AR-01	E.ON UK plc	In principle E.ON support the intention of CA025, however, a) E.ON have some concern as to whether the amendment implementation could delay the energisation of a User's connection. b) Following the comment in a), there is also some confusion between the interaction of the legal text between the STC, Grid Code and CUSC.
CA025-AR-02	Magnox	Magnox are supportive of the Proposed Amendment CA025.

- 11.3 The Committee note the views put forward by E.ON UK plc in response to the Consultation of STC Proposed Amendment CA025.
- 11.4 In response to E.ON's comment regarding the possibility of the implementation of Proposed Amendment CA025 delaying the energisation of a User's connection, the Committee would like to explain that currently the absence of the requirement to provide up to date information to National Grid in the form of a Connection Site Specification has not delayed energisation and as such do not envisage that the requirement for such information would delay energisation. The implementation of CA025 will allow National Grid to obtain the information from the TOs at an appropriate time rather than incur any delay in energisation.

- 11.5 In response to E.ON's comment regarding the STC legal text, the way in which the STC and its associated procedures have been written, are such that that they are interdependent of other industry code provisions and it is not intended that they should directly align to similar obligations in the Grid Code and CUSC. Furthermore although the Committee acknowledges E.ON's concerns regarding possible confusion between other industries codes regarding these provisions, the Committee believe that there is no specific interactions between the obligations that would necessitate further clarification regarding this proposal.
- 11.6 The Committee do note however, that the new paragraph 11.1 in Section D, Part Two, paragraph 11.1 includes terms that will need defining in Section J of the STC to ensure clarity regarding the meaning of the terms and to avoid unnecessary confusion. The Committee will raise this as an amendment proposal at a later date.

Annex 1 - Amendment Proposal Form**STC Amendment Proposal Form****CA025**

<p>1. <u>Title of Amendment Proposal</u></p> <p>Amendment to STC regarding obligations in Connection Site Specification Submissions.</p>
<p>2. <u>Description of the Proposed Amendment</u> <i>(mandatory field)</i></p> <p>Amendment to Section D, Part 1, Paragraph 2.6 such that when the TO has any new/revised information regarding the Connection Site Specification (CSS) then it shall submit a revised CSS to NGET.</p> <p>Insert new provisions in Section D, Part 2 after paragraph 10, which would necessitate the TOs to submit a new/revised Connection Site Specifications to NGET prior to the commissioning of a project.</p>
<p>3. <u>Description of Issue or Defect that Proposed Amendment seeks to Address</u> <i>(mandatory field)</i></p> <p>Currently in Section D, Part 1, Paragraph 2.6 there is an obligation on the TOs to have and maintain a CSS for each Connection Site. The information in the CSS is used to produce the Bilateral Agreements that NGET has with each customers. Without an explicit obligations for the TO to submit revised CSS to NGET as the information changes, the information that NGET holds may be out of date. Therefore the information in the Bilateral Agreements will not reflect an accurate representation of the connection site.</p> <p>There is currently no explicit obligation on the Transmission Owners to submit a revised Connection Site Specifications to NGET prior to the completion of a construction project. NGET may be at risk of not having the correct information regarding Connection Sites which is especially important prior to the completion of a construction project.</p>
<p>4. <u>Impact on the STC</u> <i>(information should be given where possible)</i></p> <p>Changes to Section D, Part 1, Paragraph 2.6 and insertion of new provisions in Section D, Part 2 (after paragraph 10).</p>
<p>5. <u>Impact on other frameworks e.g. CUSC, BSC</u> <i>(information should be given where possible)</i></p> <p>None</p>
<p>6. <u>Impact on Core Industry Documentation</u> <i>(information should be given where possible)</i></p> <p>None</p>
<p>7. <u>Impact on Computer Systems and Processes used by STC Parties</u> <i>(information should be given where possible)</i></p> <p>None</p>
<p>8. <u>Details of any Related Modifications to Other Industry Codes</u> <i>(where known)</i></p> <p>None</p>
<p>9. <u>Justification for Proposed Amendment with Reference to Applicable STC Objectives</u> <i>(mandatory field)</i></p> <p>Amending the STC in this manner would meant that the Transmission Owners would continue to be able to efficiently discharge the obligations imposed on them by transmission licences and the Act. It would also facilitate the development of an efficient, economical and coordinated system of electricity transmission.</p>

Details of Proposer Organisation's Name	National Grid Electricity Transmission plc
Capacity in which the Amendment is being proposed (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	Bec Thornton National Grid Electricity Transmission plc 01926 656386 Bec.thornton@uk.ngrid.com
Details of Representative's Alternate Name Organisation Telephone Number Email Address	John Zammit-Haber National Grid Electricity Transmission plc 01926 655389 John.Zammit-Haber@uk.ngrid.com
Attachments (Yes/No): No	

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:

Lilian Macleod
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 Amend the STC

Amend Section D, Part One, Paragraph 2.6 as follows:

2.6 Connection Site Specification

2.6.1 Each Transmission Owner shall have and maintain, at all times, a specification ("**Connection Site Specification**") which sets out the following information in relation to each Connection Site located on its Transmission System:

2.6.1.1 a description of the Transmission Connection Assets at the Connection Site and a clear identification of the boundary between Transmission Connection Assets and User Equipment;

2.6.1.2 any information reasonably requested by NGET in order to enable NGET to settle or amend its bilateral agreement with such User in respect of the Connection Site;

2.6.1.3 a description of the technical design and operational criteria which the Transmission Owner, in planning and developing its Transmission System, had assumed would apply to User Equipment at the Connection Site or to User Equipment of Embedded Users;

2.6.2 Each Transmission Owner shall submit to NGET a **Connection Site Specification** as described in Section D, Part One, sub-paragraph 2.6.1 as and when any information contained in such a **Connection Site Specification** is amended.

2.6.23 A dispute in relation to any change made to the Connection Site Specification by a Transmission Owner, or the reasonableness of a request for information made by NGET pursuant to sub-paragraph 2.6.1.2, may be referred as a Dispute to the Authority pursuant to Section H, paragraph 4.1.

2.6.34 Each Connection Site Specification shall be as proposed by the relevant Transmission Owner, subject to the subsequent determination of any Dispute referred to the Authority pursuant to sub-paragraph 2.6.23.

Insert new Section D, Part Two, Paragraph 11 and renumber existing paragraphs as follows:

10. CONNECTION SITE RULES

- 10.1 Prior to the Completion Date under a TO Construction Agreement, the following shall be submitted pursuant to the terms of the TO Construction Agreement:
- 10.1.1 copies of the Safety Rules applicable at the relevant Transmission Owner Sites or User Sites which will be used at the User/Transmission Owner interface, as followed and forwarded in accordance with the criteria set out in Section G, sub-paragraphs 2.2.7 to 2.2.10; and
 - 10.1.2 notice in writing from a Transmission Owner submitted directly to the relevant User as directed by NGET, notifying NGET when it has done so, of its Safety Coordinators, which notice shall be updated and resubmitted by the Transmission Owner whenever there is a change to the identity of its Safety Coordinators or to the Connection Points; and
 - 10.1.3 written confirmation from a Transmission Owner submitted directly to the relevant User as directed by NGET, notifying NGET when it has done so, that the Safety Coordinators acting on behalf of such Transmission Owner are authorised and competent pursuant to the requirements of OC8B; and
 - 10.1.4 written notice from a Transmission Owner submitted directly to NGET notifying NGET of a list of the managers who have been duly authorised to sign Site Responsibility Schedules on behalf of the Transmission Owner; and
 - 10.1.5 written notice from a User, as procured by NGET and submitted directly by the User to the relevant Transmission Owner of:
 - 10.1.5.1 the User's Safety Co-ordinators, which notice shall be updated yearly and whenever there is a change to the identity of the User's Safety Coordinators or to the Connection Points;
 - 10.1.5.2 a list of persons appointed by the User to undertake operational duties on the User's System and to issue and receive operational messages and instructions in relation to the User's System; and
 - 10.1.5.3 an appointed person or persons responsible for the maintenance and testing of User's Plant and Apparatus;
 - 10.1.6 a list of the User's managers who have been duly authorised to sign Site Responsibility Schedules on behalf of the User as procured by NGET and submitted by NGET to the relevant Transmission Owner; and
 - 10.1.7 written confirmation from a User, as procured by NGET and submitted directly by the User to the relevant Transmission Owner, that the Safety Co-ordinators acting on behalf of such User are authorised and competent pursuant to the requirements of OC8B.

11. CONNECTION SITE SPECIFICATIONS

11.1 Prior to the provision of an Agreement for Energisation or Agreement for an Interim Operational Notification from a Transmission Owner, the Transmission Owner shall provide to NGET a new or revised Connection Site Specification as described in Section D, Part One, sub-paragraph 2.6.1 that reflects the information contained in the relevant TO Construction Agreement(s) .

14.2. SITE RESPONSIBILITY SCHEDULES

14.2.1 In order to inform site operational staff of agreed responsibilities for Plant and/or Apparatus at an operational interface, a Site Responsibility Schedule shall be produced for a Connection Site by the Transmission Owner whose Transmission System is connected to such Connection Site and NGET shall provide such Transmission Owner with the information required to enable the Transmission Owner to prepare such Site Responsibility Schedule.

14.2.2 A Transmission Owner shall forward a Site Responsibility Schedule prepared by it pursuant to paragraph 11.1 to NGET and agree any changes that may be required to such Site Responsibility Schedule with NGET. Upon finalisation of the Site Responsibility Schedule pursuant to this paragraph 14.2.2, the Transmission Owner shall forward a duly signed Site Responsibility Schedule to NGET and NGET shall promptly sign and procure signatures from the relevant User as required and forward such signed copy of the Site Responsibility Schedule back to the Transmission Owner.

14.2.3 Each Site Responsibility Schedule must have recorded on it the Safety Rules which apply to each item of Plant and/or Apparatus in accordance with Section G, paragraph 2.2.

14.2.4 In carrying out their obligations under this paragraph 11, the Parties shall, and NGET shall procure that Users shall, comply with Appendix 1 of the Connection Conditions to the Grid Code (as amended from time to time).

123. ACCESS

123.1 The provisions relating to access to Transmission Owner's Sites by Users and to User's Sites by Transmission Owners, are set out in the Interface Agreement between such Transmission Owner and User.

123.2 In addition to the provisions relating to access referred to in paragraph 123.1, where a Transmission Owner Site contains exposed HV conductors, unaccompanied access will only be granted to individuals holding an Authority for Access issued by the Transmission Owner. The procedure for applying for authority for Access is contained in the Interface Agreement.

134. DISCONNECTION AND REMOVAL OF TRANSMISSION CONNECTION ASSETS

134.1 NGET shall provide six months notice to a Transmission Owner of the date that NGET intends to permanently disconnect User Equipment which is connected to such Transmission Owner's Transmission System.

- 134.2 NGET may provide a Transmission Owner with more than six months notice of an intended permanent disconnection of User Equipment connected to such Transmission Owner's Transmission System only where NGET has obtained the prior consent of the relevant User to give such longer notice.
- 134.3 Where NGET permanently disconnects a User which was connected to a Transmission Owner's Transmission System:
- 134.3.1 NGET shall procure that such User removes any of the User Equipment on such Transmission Owner's land within six months of the date of disconnection under paragraph 134.1 or such longer period as may be agreed between the User and such Transmission Owner; and
- 134.3.2 such Transmission Owner shall remove any of the Transmission Owner Connection Assets on the land of the User concerned within six months of termination under paragraph 134.1 or such longer period as may be agreed between the User and such Transmission Owner.
- 134.4 Each Transmission Owner shall give, and NGET shall procure, that any relevant User gives, such rights to access land as are reasonably required in order to facilitate the removal of User Equipment and Transmission Owner Connection Assets pursuant to this paragraph 13.
- 134.5 NGET shall not be in breach of its obligation to provide notice pursuant to 134.1 to the extent that any failure or delay in giving notice to a Transmission Owner was caused by a failure or delay by the relevant User in providing notice to NGET under the CUSC.

Annex 3 - Copies of Comments Received on the Proposed Amendment Report

This Annex includes copies of any representations received following circulation of the Proposed Amendment Report (circulated on 23rd May 2007, requesting comments by close of business on 7th June 2007).

Representations were received from the following parties:

No.	Company	File Number
1	E.ON UK plc	CA025-AR-01



Bali Virk
STC Committee Secretary
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

7 June, 2007

E.ON UK plc
Westwood Way
Westwood Business Park
Coventry
CV4 8LG
eon-uk.com

Paul Jones
024 76 183 383
paul.jones@eon-uk.com

Dear Bali,

CA025 – Amendment to STC Regarding Obligations in Connection Site Specification

Thank you for the opportunity to respond to the above consultation document. This response is made on behalf of E.ON UK plc. In principle we support the intention of CA025. We do have some comments however on the legal text and how this may impact Users waiting for new connections to be energised.

We have no concern about the basic intention of CA025. Should a Connection Site Specification change for a particular Connection Site, then we believe that it is only correct that National Grid is provided with the most up to date information as soon as is reasonably possible. We would have some concerns however if this amendment could delay the energising of a User's connection. That is, we do not want CA025 to result in a situation whereby a User's connection is technically ready to become operational, but can not be energised because of late provision of an updated Connection Site Specification. We therefore, have looked at how the amended STC text would interact with the CUSC and Grid Code for comfort on this point. This has caused us some confusion regarding part of the legal text for CA025.

New paragraph 11.1 to Section D Part 2 of the STC requires the TOs to provide a new or updated Connection Site Specification prior to the provision of an Agreement for Energisation or an Agreement for an Interim Operational Notification. However, the terms "Agreement for Energisation" and "Agreement for an Interim Operational Notification" do not presently appear to occur anywhere else in the STC, Grid Code or

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CUSC. The term, "Interim Operation Notification" does not seem to exist in any of the three Codes either. Moreover, the term "Operation Notification" is only defined and used in the CUSC, not in the STC, and refers solely to embedded and not transmission connected generators.

We are therefore uncertain where these Agreements for Energisation or an Interim Operational Notification arise in the industry codes. We have looked at obligations surrounding the energising of User connections which are contained in paragraph 6 of Section C Part 3 of the STC. These appear simply to require a TO to comply with an instruction to energise a User connection and do not refer to any agreement from the TO. Therefore, in the absence of further definitions of these terms within the text for CA025, this part of the amendment does not appear to be particularly legally robust or meaningful.

From a User's perspective the CUSC, as the relevant User facing Code, determines when a User's connection can be energised. As this does not refer back to provisions of the STC, we assume that notwithstanding our comments above on the legal text for the amendment, the provisions of CAP025 could not delay a User's Connection Site being energised. We would welcome National Grid's view on whether they would agree with this interpretation.

Finally, there is a typo in paragraph 11.1 of the legal text where an "i" is missing from "notification".

I hope the above comments prove helpful.

Yours sincerely

Paul Jones
Trading Arrangements

No.	Company	File Number
2	Magnox Electric Ltd	CA025-AR-02

From: david.m.ward@magnox.co.uk [<mailto:david.m.ward@magnox.co.uk>]
Sent: Thursday, May 24, 2007 10:04 AM
To: Virk, Bali
Subject: Re: STC Amendment Proposal: CA025 - Proposed Amendment Report

Bali

Thanks for sending me the proposed amendment report CA025. This changes seems perfectly reasonable to me; I have no comments.

Regards

David Ward

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Magnox Electric Ltd is a part of British Nuclear Group