



RES Tec

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18 October 2006

BY EMAIL ONLY

RES response - GB ECM-06 consultation

Dear Tom,

Renewable Energy Systems Group (RES) is one of the leading and broadest based companies in the wind energy industry. Since 1980, RES has played a central role in the development of the wind energy market in the United Kingdom and, more recently, has achieved significant success in the international market. The RES Group has now successfully constructed more than 1,000 MW of wind energy capacity internationally and retains an ownership interest in 15 operating wind energy projects, comprising more than 140 MW of operating assets.

RES welcomes the opportunity to respond to the consultation paper **GB ECM-06 “Charging arrangements associated with SQSS design variations based upon customer requests”**.

RES welcomes the proposal to amend the TNUoS charging arrangements to accommodate the impact of customer choice in grid connection arrangements. RES broadly accepts the proposed methodology. We anticipate that this will most commonly be applied when a customer requests single circuit connection and, in so doing, accepts a level of non-firm access. It is clear that a customer will only choose such a non standard connection when the perceived additional value of a fully firm connection is less than the TNUoS discount.

The one issue where RES strongly disagrees with the proposals however is with the proposed treatment of future connections. If a generator has chosen to accept a non firm connection on the basis that the discount in charges has a greater value than the benefits of a fully firm connection and taken commercial decisions on that basis, then it is not appropriate to rescind the discount at a later date. To do so is to impose a non optimal solution on the incumbent generator.

RES accepts that the GB SQSS eligibility criteria for a customer choice design variations are not proposed to change, namely the connection must not now or in the foreseeable future:

- (i) reduce the security of the main interconnected transmission system below the minimum planning criteria specified in the standard;

- (ii) result in additional investment or operational costs to any particular customer or overall, or a reduction in the security and quality of supply of the affected customers' connections to below the planning criteria in the standard, unless specific agreements are reached with affected customers; or
- (iii) compromise the Transmission Licensee's ability to meet other statutory or licence obligations.

If a generator has accepted a single circuit connection and an additional user applies to connect at the busbar/ substation, option (ii) continues to be met unless the new user is forced to accept a single circuit connection against his wishes.

The choice available to the new user and the impact on his charges are unaffected by the existence of an existing generator. If the new user requires fully firm access then a second circuit must be constructed

Upon construction, the original generator would benefit from increased security and firm access rights but to impose the full TNUoS charge for as benefit that has already been determined to be of low value is inappropriate. In imposing such a requirement option (ii) of the GB SQSS eligibility criteria will no longer be met since the choice of the second generator will result in additional investment or operational costs to the existing generator.

The principle that two generators both connected at the same point, with equal levels of security would be subject to different levels of TNUoS charges because of historic connection charges is consistent with National Grid's licence requirement to not discriminate **unduly** between users. This is a clear case of due discrimination.

In summary, RES supports the proposals for TNUoS discounts but believes that once a discount is applied it must continue until and unless the user requests otherwise.

Please do not hesitate to contact me if you have any questions.

Yours Sincerely,

Richard Ford
UK Grid Connections Manager
Renewable Energy Systems Ltd