

Craig Maloney  
Electricity Charging and Access development  
National Grid Electricity Transmission plc  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

### **TNUoS Generation Charging Zones**

Thank you for the opportunity to comment on the September 2006 consultation, which we have read in conjunction with the condition 5 information paper.

Immingham CHP believes that stability and predictability in transmission charging is very important, especially for single location power station operators such as ourselves. We therefore support the use of the least number of generation charging zones based on the 2007/08 Transport Model data as this corresponds with the current year's structure. Further we also consider that there is not a case for moving to a radically different zoning structure for the next price control period on the basis of the information provided as part of this consultation exercise to date simply to mitigate the extent of possible change during the next five year period. The reasoning for this preference is reinforced by the fact that the more fragmented structure referenced in the consultation draws on an assumed contractual background which itself is subject to change.

If there is change to the generation profile within the life of the next price control, this should only be reflected in the zonal configuration for transmission charging if the implied change is material. We agree therefore that National Grid should apply a least change criterion.

As a matter of process we would also want to see indicative charges going forward for any new proposed zoning structure before reaching a final conclusion.

Please let me know if you would like any further comment.

**Kirsten Elliott-Smith**  
**ConocoPhillips (U.K.) Limited**