



First Hydro Company is part of a joint venture between
International Power plc and Mitsui & Co., Ltd.

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Dear Mark,

Fundamental Review Update & Consultation

Thank you for the opportunity to comment on your Improving Grid Access consultation document. International Power (IPR) is responding on behalf of its power generation subsidiaries in the UK: First Hydro Company, Saltend Cogeneration Company Ltd., Rugeley Power Ltd., Deeside Power Ltd. and Indian Queens Power Ltd.

The interim review has looked at a number of “quick win” proposals dealing mainly with stability, voltage and contingency design issues. We support all of the proposed changes with the exception of the definition of load factor used in the generation connection design.

A load factor of 40% for intermittent plant and thermal plant (for example) results in a significantly different operational requirement and system design. Thermal plant with a 40% load factor is likely to be providing generation over the daily peak on a regular basis whilst the intermittent plant is not. We believe that from a system design perspective this should lead to a requirement for a more robust design for the thermal plant as its loss at the daily peak could have a significant effect. We therefore believe that the load factor definition should be based on the “load factor over the daily peak [4] hours”. This will ensure that appropriate assets are constructed.

In circumstances where a lower standard of connection is proposed the commercial arrangements will need to be addressed such that the connection is financial firm or lower connection charges result.

We hope you find these comments useful

Yours sincerely,

Simon Lord,

Transmission Services Manager