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Dear Craig

Modification Proposal GB ECM 01, One-off Charges for System to Generator Intertripping Schemes

Thank you for the opportunity to comment on Modification Proposal GB ECM 01 regarding one-off charges for system to generator intertripping schemes. This response is submitted on behalf of ScottishPower UK Division which includes the UK energy businesses of ScottishPower, namely ScottishPower Generation Ltd, ScottishPower Energy Management Ltd and ScottishPower Energy Retail Ltd.

Whilst the proposed modification appears to be straightforward we believe that there is an issue of principle which has not been addressed in the proposals. The case used to illustrate the proposal for a category 1 intertripping scheme results in the addition to the transmission infrastructure of a shareable facility in that another generator could subsequently connect at Substation A under the protection of the intertripping scheme fitted to trip Generator A. National Grid's proposal is to charge the costs of the scheme to the first generator, Generator A, as a one-off charge under the connection charging methodology. We believe that the Connection Charging Methodology should indicate, in the event that a subsequent generator connects and makes use of the facility paid for by Generator A, how and to what extent Generator A would receive a refund of some of these charges in recognition of the benefit obtained from the facility by the subsequent generator.

This issue is relevant to other one-off charges, not just system to generator intertripping schemes, e.g., the incremental costs of cable instead of overhead line in an infrastructure circuit built as part of a generator connection. We believe National Grid should address the principle of the subsequent sharing of one-off costs associated with infrastructure developments, perhaps through the industry fora, before seeking to modify the connection charging methodology specifically to deal with one-off charges for system to generator intertripping schemes.

Yours sincerely

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