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17<sup>th</sup> June 2011

Dear Tom

## **RWE RESPONSE – D/11 SYSTEM TO GENERATOR OPERATIONAL INTERTRIPPING SCHEMES**

Thank you for the invitation to provide comments on the above Grid Code consultation dated 20<sup>th</sup> May 2011. The following response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Npower Renewables Limited and RWE Supply & Trading GmbH.

RWE is supportive of the purpose of the proposed change and considers that, in particular, it will help clarify offshore system to generator Intertripping arrangements. Our comments on the proposed Grid Code text (Annex 1 of the consultation) are as follows :-

We suggest that the text *“where agreed by NGET, the User and the relevant Transmission Licensee”* contained in the definition *“System to Generator Operational Intertripping”* be deleted. This text does not make sense in that it fails to identify what would be actually agreed and also provides no guidance regarding the basis of such agreement. Furthermore, inserting additional words into an already difficult and lengthy sentence further detracts from its clarity.

We would suggest that a separate clause be inserted with the provisions for using the Relevant Transmission Licensee’s circuit breaker for this purpose. This use would be subject to agreement between NGET and the User. The need for agreement with the Relevant Transmission Licencee is probably an issue for the STC and not the Grid Code.

I trust that you will find the above comments helpful. If you wish to discuss any matters further please do not hesitate to contact me.

Yours sincerely

By e-mail

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