Ref: SB060807

6 August 2007

Tom Ireland
Electricity Charging and Access Development
National Grid Electricity Transmission plc
National Grid House
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CV34 6DA

Dear Tom

LEWIS WIND POWER RESPONSE TO 'PRE-CONSULTATION DOCUMENT GB ECM-08 FOR THE CHARGING ARRANGEMENTS ASSOCIATED WITH THE OFFSHORE TRANSMISSION NETWORK

Thank you for the opportunity to comment on the above pre-consultation. Lewis Wind Power is a joint venture between British Energy and Amec. We are developing a large wind farm on the Isle of Lewis, off the north west coast of Scotland. The views in this response are those of Lewis Wind Power specifically. Separate responses may have been made by the joint venture partners individually.

Offshore connection/use of system boundary
Of the options presented, LWP favour the 'As onshore – Offshore substation LV Busbar' approach as it is consistent with the onshore methodology and therefore does not discriminate against offshore connectees.

Offshore Circuit Expansion Factors
LWP believe that prior to acquiring actual cost data, a generic approach should be used to give users an indication of possible charges. When an OFTO's tender is selected, then the actual costs should be used to define the charges. OFTO's tenders should detail the breakdown of costs allowing the split to made between locationally varying and non-locationally varying asset costs so the fundamentals of onshore TNUoS methodology is maintained.

HVDC
LWP support the development of charging arrangements for HVDC transmission technology. The use of HVDC can depend on distance and load, therefore converter stations are not solely a locationally varying element and arguably should be treated the same as substations, transformers and switchgear. Simply because the cost of converter stations are additional to HVAC substation costs does not justify describing them as locationally varying. Accordingly, the costs of converter stations should be recovered under the flat residual portion of TNUoS. Expansion factors should only apply to the HVDC cables and as we proposed for HVAC, generic factors should be used until actual costs are available from an OFTO.

GB SQSS
LWP note the Offshore SQSS subgroup recommendation that offshore level of security should be zero redundancy. LWP believe this should not preclude the incorporation of multiple cables without overall redundant capacity so as to permit some export of power in the event of a single cable failure. LWP look forward to revised charging amendments proposals to deal with Onshore SQSS Design Variations.

I trust you will find these comments helpful. I would be happy to clarify any aspect of our response with you should you wish.

Yours sincerely

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