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Improving Grid Access - Technical Consultation on the Model for Improving Grid Access

SP Transmission Response to DECC Consultation Document

This response is from SP EnergyNetworks, which is responsible for the three licensed transmission and distribution businesses owned by ScottishPower, namely SP Transmission Ltd, SP Distribution Ltd and SP Manweb plc.

We believe that the model proposed by DECC is a pragmatic solution to grid access and we are pleased that DECC recognizes that the ultimate solution to resolving network constraints is to reinforce the GB transmission network. On this latter point, we will continue to work with Ofgem to ensure that timely funding for key transmission reinforcement projects is provided.

Self-Derogations

We support the principle of self-derogations from the SQSS. However we believe that all TOs should be subject to the same obligations to produce a report to the GB System Operator (GBSO). Currently the guidance document indicates that the Scottish TOs have a period of 70 days in which to prepare and submit a report to the GBSO, yet NGET as TO in England and Wales is not subject to same timescales.

For consistency, and to ensure transparency in the treatment of connect and manage applications, we believe that the GBSO should publish details of all self-derogations which are granted as well as clear reasons for refusals. In addition, we believe that there needs to be clear and unambiguous guidance provided by the GBSO on how it will undertake the derogation request assessment process.

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Transition

During the transition period it will be necessary to update the SO-TO Code to include the process and criteria for derogations. This will involve reviewing the SO-TO Code Procedures to ensure that all process requirements are captured and there is no compromise on offer timescales. It may also include developing a standard template for the self-derogation report to ensure consistency across the transmission owners.

It would also be helpful if DECC could confirm whether the Licence derogation in respect of the Scotland-England Interconnector remains or whether a new self-derogation must be prepared.

Enabling Works

We agree that the proposed use of enabling works should not be a rigid definition and should have the flexibility as indicated within the guidance document. We would also expect that any changes to the amount of enabling works, whether less than or more than the maximum level, would be discussed not only by the developer and SO but also between the GBSO and relevant TO. It will be important for the success of this initiative to ensure that the definition of enabling works is not set wider than needed in any particular case, and we think there could usefully be a mechanism for keeping this under review.

The current definition adopted within the consultation leads to a number of anomalies appearing within the SPT transmission system, for instance the 132kV substation at Bonnybridge is identified as being a MITS substation, yet the 275kV substation which it is fed from is not. We also note that the diagram adopted within the guidance document does not show the entire SP Transmission system, only those sections which are interconnected i.e. some radial transmission circuits are missing which would have the impact of increasing the number of MITS substations within SPT's licensed area.

We believe that the current definition for a MITS substation does not reflect the difference in scales of the transmission system in Scotland compared with that in England and Wales and consequently the application of the definition gives rise to the potential for a high degree of complexity and interactivity in connections, due to the low level of MITS substations identified. This is likely to be exacerbated through any change to remove the radial circuits currently included within the definition. However, we recommend that changing the definition of MITS Substation (within SPT's area) to reflect a transmission substation with four or more Main System Circuits connecting at that substation, would better reflect those substations which we believe form an integral part of the MITS in the SPT area.

Yours sincerely,



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