



Modification Proposal 241 – Delaying the implementation of the ad-hoc application principle of the enduring offtake arrangements
Comments from AEP¹

The Association welcomes the opportunity to comment on this draft modification report.

The Association supports the proposal.

The Association considers that the ad-hoc application principle is an important feature of the enduring offtake arrangements and is disappointed that this will not be available from the implementation date of the arrangements of 1 April 2009. We urge National Grid to ensure that this may proceed smoothly from October this year.

However we appreciate that the initialisation of the regime requires a number of processes to be established that do not readily fit with providing for an ad-hoc process prior to the first application window in July 2009. These include notification of initial rights on 1 May and approval of the ExCR Methodology Statement. We also understand that the enduring capacity rights will not become effective until October 2012 so the ad-hoc process could not be used for capacity release prior to that date.

We consider that the proposal furthers the relevant objectives; SSC A11.1 (f) avoiding applications for capacity prior to the ExCR methodology statement being approved.

February 12, 2009

¹ The Association of Electricity Producers (AEP) represents large, medium and small companies accounting for more than 95 per cent of the UK generating capacity, together with a number of businesses that provide equipment and services to the generating industry. Between them, the members embrace all of the generating technologies used commercially in the UK, from coal, gas and nuclear power, to a wide range of renewable energies.