

Representation

Draft Modification Report

0373: Governance of NTS connection processes

Consultation close out date: 30 March 2012
Respond to: enquiries@gasgovernance.co.uk
Organisation: Association of Electricity Producers
Representative: Julie Cox
Date of Representation: 29 March 2012

Do you support or oppose implementation?

Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

The Association supports this proposal since it will provide a framework for the provision of connection offers which will give more certainty and confidence over costs and timescales than the previous rather ad-hoc arrangements. The Association and its members have been closely involved in the development and refinement of this proposal it has been a lengthy process but working in close collaboration with National Grid, with a few compromises on both sides, we now believe this proposal has widespread support and will provide a platform for future developments.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

No

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The Association agrees with the points made in the Draft Modification Report. In particular that transparency and consistency of treatment of connecting parties will ensure that connections are progressed in a non-discriminatory manner. This alongside greater certainty over timescales and costs will lead to efficiencies in connecting party's projects which seek to support a competitive market.

We also agree that the determination of a cost reflective fixed fee provides for compliance with the relevant objective of the charging methodology.

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

As a Trade Association - none

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We would like to see this implemented as soon as possible, subject to notice of charges, so that our Members and other parties seeking new connections can benefit from the improved governance of connection processes that this proposal brings.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

The Association is content that the legal text will deliver the intent of the modification, but we have the following comments.

- 1) V 13.2.1, V13.2.4 and Y 25 A are repetitive and a bit unclear saying fees are reviewed, annually, regularly and annually or ad-hoc. It may be better if V13 simply refers to Y25A
- 2) 13.4.1 (f) on the third line in () it should say Connection Applicant submit rather than Connection application submit...
- 3) 13.5.3 seems to avoid the use of the term construction agreement, whilst 13.6.2A (c) uses this term, implying that signing a construction agreement is the means by which an Applicant accepts the Connection Offer. These paragraphs need to be consistent.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

We note that National Grid's recently issued business plan states that it plans to operate according to modification 373 principles whether the modification is implemented or not. However we would maintain that it is important that such principles are clearly established within the UNC.