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09 June 2008

Dear Mrs Geitona,

EREGG Consultation on Guidelines for Good Practice for Operational Security

Scottish & Southern Energy is a UK based energy company with interests throughout Europe particularly in the development of renewable generation. We therefore believe it is very important to understand the technical framework for operational security and, in particular, how this impacts on generators. It is also important to understand how TSOs calculate transmission capacity and to have transparency of information of available capacity.

The different stakeholders and market players need to be clear on their specific roles and in general, the key roles appear to be reasonable. However, we believe that as currently drafted the guidelines are too general and could, for example, apply to generators of any size irrespective of their ability to contribute to operational security. We believe this would be unreasonable and disproportionate. The guidelines should therefore be clarified to include only large or transmission connected generating stations. It should also be made clear that the guidelines apply to the operators of generating stations and we would therefore propose the following wording: "4.4.1 the operators of large and/or transmission connected generating stations shall:"

Similar principles should apply to consumption sites, i.e. "4.5.1. The operators of consumption sites directly connected to a transmission system shall:"

I hope this information is helpful and if you have any questions or need further information please give me a call.

Yours sincerely

David Densley
Head of European Affairs