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Mrs Fay Geitona
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By email

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Dear Mrs Geitona

Draft Comitology Guideline on Fundamental Electricity Data Transparency

In response to your consultation on this we have the following answers to your questions:

1. We believe that the fundamentals for transparency are already in place in Great Britain. We are concerned about any additional intrusive requirements for data production, although we accept that there might be more to do in terms of making this appropriately widely available.
2. As drafted, and particularly with limits on generation down to 1MW (ref 4.3.2.1), we would expect at least two years to put in place the administration necessary to fulfil 4.3.2.1. We do not see what value this imposition provides.
3. No
4. No
5. Yes
6. No comment
7. From a GB perspective these proposals seem over prescriptive and largely unwarranted.
8. No comment
9. As far as we are aware the name of Balancing Mechanism Units are public domain in GB, so see no problem at all with this.
10. For commercial purposes the identify of the assets involved is largely irrelevant. There will also be existing contractual and Code requirements for the control of failure etc information.
11. We are content with 100MW as a threshold. It also lines up with the existing transition between Medium and Large in the context of Power Stations in England and Wales.
12. No comment

13. Plant

14. No. Should be 100MW.

15. Neither. The requirement to provide information should be on system need, not on generation type.

16. No comment

17. No comment.

Yours sincerely,

Mike Kay
Network Strategy Director