

Chandima Dutton
Transmission Asset Management
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV 34 6DA

Your ref
Our ref
Name Stephen Rose
Phone 01793 892068
Fax 01793 892981
E-Mail stephen.rose@rwenpower.com

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Transmission Planning Code

Dear Chandima,

RWE npower welcomes the opportunity to comment on your consultation about the scope of the future Transmission Planning Code and does so on behalf of all its licensed gas businesses and the GB business of RWE Trading GmbH.

The Transmission Planning Code is at an early stage of development and the content and level of detail required of it will become clearer once the planned workshops commence. We are broadly supportive of the scope set out in the consultation but make a few general comments below.

You will no doubt be aware that Centrica Storage Ltd recently commissioned a study from Advantica looking at the availability of entry capacity at Easington next winter. Whilst not directly relevant to the Transmission Planning Code we believe this study could provide a useful test against which the adequacy of the Transmission Planning Code can be judged.

We believe the Transmission Planning code should contain the necessary information at a sufficient level of detail to enable parties to undertake their own network modelling of the NTS, such that they are able to derive a credible view of future capacity availability. Whilst this view may ultimately prove to be incorrect or inexact due to subsequent developments, the Transmission Planning Code should be sufficiently detailed to enable parties to derive credible views based on what is known to National Grid at the time.

We think it will be important to ensure that the Transmission Planning Code includes appropriate information concerning the pressure obligations and constraints that exist on the NTS, and how compressors are used to meet these. This is not specifically referenced in the scope and although it is perhaps implied in section 4, we believe it should specifically be referenced in the scope.

Similarly National Grid's procurement strategy will be relevant to the speed at which National Grid can deliver capacity, and we believe this too should be specifically referenced in the scope.

RWE npower

Trigonos
Windmill Hill Business
Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

T +44(0)1793/87 77 77
F +44(0)1793/89 25 25
I www.rwenpower.com

Registered office:
RWE Npower plc
Windmill Hill Business
Park
Whitehill Way
Swindon
Wiltshire SN5 6PB

Registered in England
and Wales no. 3892782

Finally, with regard to supply and demand data we believe it is important that National Grid persist with the current TBE process for consulting on the future supply/demand outlook and that the results from this feed seamlessly into the planning and development of the NTS. The Ten Year Statement should continue to be developed and published as National Grid best see fit. However, where National Grid present scenarios about how the supply/demand outlook may change over time within the Ten Year Statement, it will be important that the Transmission Planning Code makes it clear how such uncertainty will be addressed when it comes to the network planning and development National Grid are required to undertake.

We hope you find our comments helpful and we look forward to participating in the forthcoming workshops. Should you wish to discuss our response in more detail please do not hesitate to contact me.

Yours sincerely,

Steve Rose
Economic Regulation

Sent by e-mail and therefore not signed