

12 August , 2005

Craig Maloney

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Dear Craig,

One-off Charges for System to Generator Intertipping Schemes

Thank you for the opportunity to comment on the above consultation.

We have reviewed the charging proposals for operational intertrips and we are in broad agreement with what has been set out in this consultation. Since the consultation asked for comments and views we wish to have clarification on the following points (which may be addressed in the CUSC) in the interests of transparency and non-discriminatory application.

In Category 1 and 3 intertrips there could be issues surrounding interactive offers and ensuring a connecting party did not end up paying for stranded assets. For example if the intertrip requirement were not triggered by the first in queue but by a subsequent connection application, would the first applicant be asked to underwrite the intertrip costs in case they subsequently withdrew?

Are the works required to provide an operational intertrip in Categories 1 & 3 contestable (works that may be done by a party other than the network owner) since by definition they are not deemed infrastructure?

In Category 3 is it the intention that a proposed connecting generator be given the option of paying for re-inforcement of the third party system rather than accepting an intertrip? Would the relative costs be known at the time of a connection offer for an informed decision to be made?

If you have any questions regarding this response please do not hesitate to contact me.


Yours sincerely,




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