

James Cooper (NETS SQSS Secretary)
National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

31 January 2013

Dear James

National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) – Industry consultation: Offshore Infeed Loss (GSR013)

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

Our responses to the consultation questions are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Mark Cox on 01452 658415, or myself.

I confirm that this letter and its attachment may be published on National Grid's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Linford'.

Denis Linford
Corporate Policy and Regulation Director

Attachment

National Electricity Transmission System Security and Quality of Supply Standard (NETS SQSS) – Industry consultation: Offshore Infeed Loss (GSR013)

EDF Energy's response to your questions

Q1. Do you agree that the proposed modification meets the principles and/or objectives of the SQSS?

On the evidence presented in the report it seems appropriate to conclude the existing SQSS clauses remain valid for offshore infeed risk noting that HVDC monopole configurations of greater than 1320MW may not be compliant.

Q2. HVDC converter fault – do you agree with the conclusion that HVDC converter faults are likely to occur at a frequency which should be covered by Normal Infeed Loss Risk and current SQSS remains valid in this area?

On the evidence presented in the report this would also seem to be a reasonable conclusion. However, it is expected that Voltage Sourced Converter technology will increasingly be used for these high capacity connections and their failure rate should be kept under review.

Q3. Risk of multiple cable failure due to anchor damage – do you agree with the conclusion that there is no significant merit for SQSS to specify an offshore cable separation to mitigate the risk of multiple cable failure due to anchor damage?

Developers and OFTO's will be mindful of the need to have high reliability of offshore connections. On this basis we would expect that where a more significant risk of anchor damage is possible, for example, where cables traverse major shipping lanes, then developers would increase separation and/or entrench the cables.

EDF Energy
January 2013