



Colin Williams,
Regulatory Frameworks (B3),
Transmission Network Services,
National Grid,
National Grid House,
Gallows Hill,
Warwick,
CV34 6DA

29 October 2012

Dear Colin,

NTS GCD10 – Potential one-off change to TO Exit (Flat) Capacity Charges for April 2013

InterGen welcomes the opportunity to respond to this draft discussion document. As one of the UK's largest independent generators, InterGen is supportive of any charging change that addresses the current volatility and allows us to more accurately predict future charging levels. InterGen's responses to the questions posed in the discussion document are set out below.

Do you support the use of a one-off April charge change effective from April 2013?

Yes, InterGen is supportive of this change.

Do you agree that a one-off April 2013 charge change should only be used if the outcome of the RIIO-T1 price control presents a significant step change in allowed revenues?

No, InterGen believes that any change that reduces the inherent volatility of exit capacity charging will be in the best interests of industry, in particular independent generators for whom charging volatility presents the most serious issues.

Would a one-off April change have an adverse impact on any of your business processes?

No, it would be a welcome development.

Are there any other items in relation to the use of a one-off change that you believe to be relevant that should be taken into account or warrant further consideration?

No.

Yours Faithfully,

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

Melissa McKerrow

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Public Affairs Manager

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