

Rachel Clark
Programme Director, Switching Programme
Ofgem
10 South Colonnade
Canary Wharf
LONDON
E14 4PU

By email only to: switching.programme@ofgem.gov.uk

28 May 2021

Dear Rachel

Statutory consultation on a proposal to modify standard conditions of all electricity distribution licences (REC changes and MRA removal)

Thank you for the opportunity to comment on the above statutory consultation, dated 30 April 2021. This response should be regarded as a consolidated response on behalf of UK Power Networks' affected distribution licence holding companies: Eastern Power Networks plc; London Power Networks plc; and South Eastern Power Networks plc.

Our response is based on the presumption that where the licence modification states that a requirement that was previously in the MRA is now in the REC, that the REC does in fact address that requirement.

We are broadly comfortable with the changes and our feedback on the drafting is contained in the appendix to this letter. We believe it is important for Ofgem to follow-up on the point regarding the source version of the licence used for the changes as this may have a bearing on whether some changes are required to be implemented.

My team is happy to discuss the feedback in more detail, in this respect please contact Paul Measday in the first instance.

Yours sincerely



Basil Scarsella
Chief Executive Officer
UK Power Networks

Copy: Suleman Alli, Director of Customer Service, Strategy, Regulation & IS, UK Power Networks
James Hope, Head of Regulation & Regulatory Finance, UK Power Networks
Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

Appendix

1. With the removal of the word “Catalogue” from the defined term “Data Transfer Catalogue” and changing the defined term to “Data Specification”, the defined term no longer aligns to the definition itself which starts “means the catalogue of that name...”. This could be remedied by adding “Catalogue” back into the defined term or by amending the definition so it starts “Means the specification of that name...”.
2. The definition of “Metering Point” refers to “the MRA Transition Schedule”. The reference to “Transition” in the name of this schedule implies that this schedule is not an enduring one and therefore may require a further licence modification in due course to update it. To reduce the need for future changes to the licence it may be prudent to change either the REC or the reference on the face of the licence accordingly, we are happy to work with Ofgem to achieve this.
3. The changes in paragraphs 13C.10 and 14.5 appear to replace wording with exactly the same wording and we are therefore unclear on what the actual changes are.
4. We believe that the changes in paragraphs 14.16 and 14.21 are already in the base versions of the licence condition having been implemented just prior to the start of RIIO-ED1. We seek clarity from Ofgem regarding the source version of the underlying licence condition it based its changes on. Please see the following Notice ([WPDSLNotice \(ofgem.gov.uk\)](http://www.ofgem.gov.uk/wp-content/uploads/2014/05/WPDSL-Notice-2014-05-20.pdf)) from May 2014 which implements the “capacity report” change in paragraph 14.21.

