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Dear John

Multiple Interruption Overall Standard - Draft Determination

I am writing on behalf of Yorkshire Electricity Distribution plc (YEDL) and Northern Electric Distribution Ltd (NEDL) in response to the draft determination for the proposed multiple interruption overall standard.

In my e-mail yesterday and in our conversation today I indicated that our only significant comment is for the determination to clarify the treatment of force majeure events. You indicated that the treatment of events under this standard will be the same as that under IIP and this is covered by the paragraph that refers to the RIGS.

I have looked at the RIGS and found this not to be the case for force majeure exemptions. If the treatment of interruptions is to be the same as IIP, particularly under force majeure events, then the paragraph on page 17 of the determination should also make reference to paragraph 10 of special licence condition G. The paragraph should therefore read:

"For the purposes of Service 5 -

The number and duration of interruptions, the number of customers affected by an interruption and the total number of customers of the ex-PES distributor shall be determined in accordance with the Regulatory Instructions and Guidance issued by the Authority under standard licence condition 49 of electricity distribution licences. Where performance has been materially and adversely affected by an exceptional event then the number of customers affected will be adjusted in accordance with the procedures specified by paragraph 10 of special licence condition G.

If you would like to discuss this point further please contact me on 01977 605856.

Yours sincerely

ANDREW SPENCER
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