

Our ref :
Your ref :

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**TRANSFER OBJECTIONS: STRONGER RIGHTS FOR INDUSTRIAL AND COMMERCIAL
CUSTOMERS - RESPONSE TO CONSULTATION**

Dear Ian

East Midlands Electricity Distribution plc welcomes the opportunity to respond to the above consultation document.

We recognise that the objection process is primarily a matter for the customers and their suppliers, however, we would like to comment on three elements of the process.

1. Withdrawal of registration

It may be possible to alter the objection process to enable a supplier to withdraw a registration. In practical terms this could be a self-objection using the existing rules regarding timescales. This would require some changes to existing dataflows to enable the originator, the MPAS provider and other parties to be aware of the withdrawal.

2. Change to the Clause 16 of the MRA

If clause 16 is amended to allow suppliers to object only in accordance with the contract between that supplier and their customer, then consideration would have to be given to if this could be enforced through the MRA. If a supplier alleged a breach of that clause against another supplier, then it may be that the MRA Executive Committee would not have access, due to confidentiality, to the prime document. In order to mitigate against this potential problem it could be that alleged breaches of this clause be directed to the Authority for investigation and decision.

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3. Valid objection within MPAS

In section 3.7 of the consultation document it correctly states that MPAS is not required to check that an objection is valid and in accordance with the objection criteria. This proviso should be maintained on the basis that the MPAS operator does not and should not have access to the contractual arrangements between a customer and their supplier.

If you require any further information please contact Geoff Huckerby on 01332 393820.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L. Queripel', followed by a period.

Lesley Queripel
Regulatory Strategy Manager