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Dear Lesley

Derogation Requests to Facilitate Earlier Connection of Generation

The above consultation appears to deal principally with access requirements for generation, whilst also introducing more general questions about derogation arrangements. We particularly welcome the opportunity to comment on Question 4, and the development of the self certification process for P2/6.

P2/6 provides fundamentally important design guidance for networks, and its deterministic principles continue to underpin their security provisions. However, we do believe that there is a need to consider the development of more precise definition of compliance, perhaps by introducing some acceptable and agreed tolerance. This approach appears to be particularly appropriate at the current time where there is a degree of uncertainty in the way future demand may emerge, driven by the current economic climate and the potential increase in distributed generation and demand side participation.

I trust this brief response outlines our interest in this important subject, and a wish to work with the DNO community and Ofgem to further develop the definitions and an associated process of self certification. However, should you need any additional information or discussion please do not hesitate to contact me on 02476 185763, or by email at jeff.douglas@central-networks.co.uk.

Yours sincerely

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