Emma Kelso Head of GB Markets Ofgem 9 Millbank LONDON SW1P 3GE



9 May 2008

Dear Emma

Re. New metering technology in public lighting

Thank you for your letter of 1 April 2008. We are responding on behalf of our three licensed distribution network operators, EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc and EDF Energy Networks (SPN) plc.

We have concerns over the proposal to develop a new standard following the recent rollout of Elexon's CP1196 scheme which already allows customers to enjoy the full energy saving benefit of remote switching and dimming of lamps via CMS systems. With the combination of CP1196 and *traditional* MPAN solutions already available, the introduction of a third scheme would need to deliver clear benefits to customers and the impacts on the existing schemes and the settlements market would need to be explored in detail before its introduction.

It is also worth noting that if PLC is used as the communication technology then we need to ensure it does not restrict other possible uses of PLC.

Please do not hesitate to contact me if you wish to discuss further.

Yours sincerely

Paul Measday Regulation Manager