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3 September 2009

Dear Mr Hodgart

COLLECTIVE LICENCE MODIFICATION PROPOSAL ref. 91/09 (putting in place a licence obligation on Distribution Services Providers to deliver revised charging and governance arrangements for the extra high voltage levels of the electricity distribution networks for implementation with effect from 1 April 2011 and a licence obligation on all licensees to ensure that both the common distribution charging methodology for charging at the lower voltage levels and the revised extra high voltage distribution charging methodology for charging at the extra high voltage levels are incorporated within the Distribution Connection and Use of System Agreement from the time of their implementation)

This is to confirm that CE Electric UK Funding Company (CE), acting on behalf of Northern Electric Distribution Ltd (NEDL) and Yorkshire Electricity Distribution plc (YEDL), does not wish to register a statutory objection to the above collective licence modification proposal.

I confirm that I possess the delegated authority by CE to give consent to a licence modification of this nature. In giving consent to this licence modification I would bring to Ofgem's attention the following issues which, whilst not material to our consent, may be of value to you in arriving at a final drafting:

- in paragraph 13B.13, it is set out that modification proposals must be handled by the licensee in conjunction with all Distribution Services Providers. This was fine in SLC13A, in respect of the CDCM, as there is only the one methodology. As there are two methodologies to choose from in the EDCM world, I wonder whether a modification proposal relating to a given methodology should be handled only by the relevant Associated Licensees (i.e. those Distribution Services Providers who are wedded to that particular methodology);
- in paragraph 50A.12(a) of SLC50A there should be a hyphen between 'long' and 'run';

CE ELECTRIC UK FUNDING COMPANY

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- in paragraph 50A.12(b) there should be a hyphen in 'forward cost pricing methodology' in- most likely between 'forward' and 'cost'; and
- in the final line of paragraph 13B.20 of SLC13B, 'e' should be 'be'.

I hope my comments have been of assistance.

Yours sincerely,

A handwritten signature in black ink that reads "John France". The signature is written in a cursive style with a large initial "J" and "F".

John France
Regulation Director