

Paul Newman

Subject: Electricity distribution price control review initial licence drafting consultation

Mario / Nick

Please find set out below and attached a small number of comments from CE Electric that are supplementary to the DNO response (which we fully support) that was submitted by Roger Barnard on 16 November.

- A number of typographical and similar points are set out in the attachment hereto.
- Care will need to be taken that any auditing required under **SLC44B.5(g)** does not duplicate existing requirements under SLC47.
- With regard to paragraphs A3 and A4 of Appendix 1 to **SLC44B**, are 'Balancing Mechanism Unit Connection Points', 'Half-hourly Connection Points' and 'Non-half-hourly Connection Points' defined anywhere, whether within the licence or without? It may be that the appropriate term is 'Boundary Points', per the BSC, which covers all these aspects. We shall also need to define 'Inset DNO Connection Points', or find an existing standard definition from somewhere else.
- With regard to paragraph A9(b) of Appendix 1 to **SLC44B**, should the reporting lag not require the information to be provided in the third, rather than the second, following regulatory year? This is because units flowing, say, at the end of the 2010/11 regulatory year in March 2011 will see DF reconciliation runs in April 2013 or so, giving us a fighting chance of reporting by 31 July 2013, ie the third (2013/14) regulatory year. Even if we reverted to RF runs, where units flowing in March 2011 would be reconciled and reported in June 2012, it would remain very tight for reporting to be required by the end of the next month (ie by 31 July in the second following regulatory year) – especially if any audit activity should be involved.
- With regard to **SLC46A.4(d) and (e)**, the drafting could perhaps be made a little clearer. As we understand it, the requirement is for companies to list their consumption of fuel, energy, electricity and other greenhouse gases (such as SF6 and, if appropriate, air conditioning losses), add in the appropriate consumption of relevant contractors, explain where figures have had to be estimated rather than measured directly (eg from miles driven rather than fuel consumed), convert the measurements to carbon emissions using a specified methodology and set of conversion factors and sum to a total. If this understanding is correct, (d) will need to be rewritten, since it seems to require separate reporting for different parts of the business rather than particular activities. The references to GHG emissions in (d), (e) and (f) are only correct in relation to SF6, so the wording may need to be broadened. "Attribution" in (e) may not be the best word since it seems to imply apportioning between direct and contractors: we believe that what is needed is separate identification of the two data streams.
- In Appendix 1 to **CRC13** a number of hyphens should be added – eg "low voltage connection activities" should be "low-voltage connection activities" (where an adjective and a noun are put together to act effectively as an adjective in front of another noun, they should be hyphenated – thus "low voltage" does not require a hyphen, but "low-voltage substation" does require a hyphen).

In addition, I have spotted one or two typographical errors in the version of **SLC44** that we had before us at the last LDWG meeting:

- In paragraph 44.8 "paragraphs" in the first line should be "paragraph" and "which" in the second line should be "that";
- In the heading immediately prior to para 44.9, "Prohibition" should not have an initial capital, and "cross" and "subsidy" should be hyphenated

I hope you find these comments helpful.

Regards,

Tony

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