

Rachel Fletcher
Partner, Distribution
The Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Paul Whittaker
UK Director of Regulation

paul.whittaker@uk.ngrid.com
Direct tel +44 (0)1926 653190
Direct fax +44 (0)1926 656520

www.nationalgrid.com

17th November 2009

Dear Rachel

Electricity Distribution Price Control Review Initial Licence Drafting Consultation

Thank you for the opportunity to respond to this consultation. While National Grid does not have a direct interest in the issues raised by DPCR5, we note the direction in which policy is developing in relation to network operators and that this is likely to influence the policies affecting National Grid's electricity transmission and gas transportation businesses in the future.

In this light, we note the proposed drafting of Condition 46A (Business Carbon Footprint Report). National Grid is supportive of the environmental objectives pursued by this proposed condition, but is concerned that it is not clear from the drafting whether the reporting required by it will be prepared in a consistent manner with other similar reporting obligations.

In particular, National Grid suggests that the policy goals of this proposal can be best served by ensuring that the requirement to calculate the Business Carbon Footprint under the Business Carbon Footprint RIGs should be consistent both in:

- method of calculation; and
- time periods for reporting

as the reporting to be required under the Carbon Reduction Commitment Order. This will avoid licensees being subjected to conflicting reporting obligations which would raise the costs and administrative burden of compliance unnecessarily while also potentially reducing the effectiveness of the proposed provisions.

I hope this is helpful, but if you have any queries, please do not hesitate to contact me or James Wynn-Evans on (01926) 655448.

Yours sincerely

[By e-mail]

Paul Whittaker
UK Director of Regulation