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Rachel Fletcher  
Partner, Distribution  
The Office of Gas and Electricity Markets  
9 Millbank  
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22 January 2010

Dear Rachel

### **Annual stakeholder report on electricity distribution**

I am writing on behalf of CE Electric UK Funding Company (CE) and its wholly-owned electricity distribution licensees Northern Electric Distribution Limited (NEDL) and Yorkshire Electricity Distribution plc (YEDL). This letter provides our response to your letter of 17 December 2009 on the annual stakeholder report on electricity distribution.

We fully support the principles underpinning the proposed stakeholder report and would offer comments on the proposals set out by Ofgem in the letter as follows:

#### Guaranteed standards of performance for connections and non connections

We agree with Ofgem's proposal to include a summary of what each guaranteed standard is, the amount of compensation customers can receive if guaranteed standards are not met and what customers need to do in order to receive the compensation. Notwithstanding any obligation that may reside with Consumer Focus, we would also like to see Ofgem publish DNO performance against the guaranteed standards as part of its annual stakeholder report. We believe that this would usefully provide a "one-stop shop" where customers could assess DNO performance using truly comparable information as defined by the Regulatory Instructions and Guidance. Comparative performance evaluation would be further enhanced if Ofgem were to publish details of numbers of services provided. By the same token, in the case of connections guaranteed standards, we favour the use of DNO performance against the connections guaranteed standards over the use of information that compares the average and maximum time it has taken each DNO to provide a connection offer.

#### Areas of outstanding natural beauty

We disagree with Ofgem's view that stakeholders will not find information useful on how the DNOs spent the allowance for undergrounding the network in areas of outstanding natural beauty. In our experience, we have found that our stakeholders are interested in the work that we have carried out in the nine national parks and areas of outstanding natural beauty that we have within our licence areas. Therefore, we recommend to Ofgem that such information is included in the annual consumer report.

We hope that you will find these comments helpful, and should be happy to enlarge upon either of them if that would be of assistance to you.

#### **CE ELECTRIC UK FUNDING COMPANY**

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Yours sincerely

*T H Sharp*

Tony Sharp  
Regulation Manager