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21st January 2010

Dear Rachel

Annual stakeholder report on electricity distribution

Thank you for your letter dated 17 December and the chance to comment on the proposed new report from 2011.

We support the introduction of such a report which should be a useful document for all stakeholders; having such information in one report will also enhance transparency. We have a very limited number of observations to make on the proposal:

1. We have some concerns over the proposal to report on the average and maximum time to make a connection offer. Firstly this implies an additional reporting requirement and we suggest that the data already being collected on performance against the new GSoP targets could be used instead to provide customers with very similar information. Secondly, we believe this measure may also be misleading for customers. Whilst this figure obviously gives some useful indications, performance will fluctuate and the maximum time could be a one off exceptional circumstance that is not representative of overall performance. The inference is that this will show who the best performer is, but if there are no volumes to show context then it would be a very crude measure. It also takes no account of the cost of providing quotes in that timescale and would lead to an incentive, perhaps unintended, to try to get quotes out quicker, thereby increasing costs to customers. We would ask you to reconsider this specific proposal.

2. We note you are proposing to publish “league tables” relating to business carbon footprint and wonder how will these tables take the respective DNO size into account?
3. Given the general amount of information to be published, we wonder if companies will be granted space for any narrative as in some other previous reports so that our data can be explained where necessary.

I hope you find these comments helpful.

Yours sincerely

Paul Bircham
Regulation Director