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5 March 2010

Dear Rachel

Standard Condition 24 (Distribution System planning standard and quality of performance reporting): Electricity Distribution Licence

Further to your open letter dated 28 February, Central Networks has the following comments on the extension of the simplified arrangements related to the management of compliance with ER P2/6.

We have not seen evidence of any deterioration in network performance as a result of the introduction of the revised management of compliance with ER P2/6 and recognise the efficiencies gained in the reduction in regulatory burden.

Central Networks has always planned and developed the distribution system in accordance with a standard not less than that set out in ER P2/6 and will continue to do so, thereby endeavouring to improve or at least maintain the reliability of networks.

We are continually improving the monitoring of demand levels on the distribution system and the forecasting of demand growth which enhances our ability to identify and forecast P2/6 compliance issues and allows for the development and implementation of appropriate and timely solutions. Delay in implementing solutions or identifying compliance issues would only occur in exceptional circumstances.

We consider that the updated guidance on licence derogation requests



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provided in 2009 has improved the clarity about the circumstances, type of information required and the criteria for a derogation and has assisted the process. Also the introduction of outputs in DPCR5 provides an additional mechanism for monitoring the reliability of networks and may help to ensure that there is no deterioration in performance.

I trust this information meets your current requirements, but should you need any further details, please do not hesitate to contact me.

Yours sincerely

Jeff Douglas
Head of Network Strategy and Development