

Dear Ms Schrier,

Thank you for your note on Friday evening, and for the more formal consultation document today.

BOC is delighted that OFGEM is minded to extend the implementation timescales for the changes to EDCM, and publicly supports it in this regard.

For some time BOC's view has been that

- 1 running the EDCM review so close on the heels of the CDCM boundary review would cause confusion amongst the customers potentially affected by that review,
- 2 that whatever the boundary decision, it would have an unpredictable knock-on effect on the larger EDCM customers,
- 3 further work is needed to refine the LRIC/ FCP and Option models such that shocks changes are avoided (both on initial implementation and in the medium term)
- 4 a longer lead time is required to allow large consumers to budget for cost changes which could exceed £1million/annum on some sites.

I aim to continue to contribute to this process over the coming months, to help create a charging structure which combines an appreciation of historic investments with a fair and stable distribution pricing policy to encourage generation and demand customers to invest in the UK.

Yours sincerely,

**Christopher Webb**

Utilities Manager - UK & Ireland