

Gareth Evans
Ofgem
9 Millbank
London
SW1P 3GE

20 July 2010

Dear Gareth,

Long Term Development Statements for Electricity Distribution Networks – Consultation on the Form of Statement

Thank you for the opportunity to comment on the above consultation. This response should be regarded as a consolidated response on behalf of EDF Energy's four distribution licence holding companies – EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, and EDF Energy (IDNO) Ltd. For convenience, the four licensees are collectively referred to as "EDF Energy" throughout.

Following Ofgem's decision on the Long Term Development Statement (LTDS) dated 19 August 2005, and the above consultation, we agree with Ofgem that some changes in the Form of Statement (FoS) would improve the quality and usability of DNOs' LTDS. However, we have some concerns about Ofgem's proposed changes to the FoS – please see our detailed comments below:

Resource impact for DNOs of implementing and maintaining the various suggested changes to the FoS

We are pleased to hear that Ofgem has recognised that the resource implications for DNOs resulting from FoS changes must be taken fully into account. It is our view that the production and maintenance of the current LTDS is a very time consuming and resource intensive process. We estimate that it takes approximately 22 man days to update this document for each of the distribution networks we own, operate and maintain.

Making the LTDS available in a common electronic format

We believe that it should be an ambition to make the LTDS available in a common format. This should be achieved in consultation with stakeholders and DNOs, recognising that not all DNOs produce data in the same format and it may be disproportionately expensive to do so. A cost benefit analysis should be undertaken before making a decision to proceed.

Making the LTDS available on the website

We acknowledge that publishing a full LTDS document on the DNO's website is beneficial for those who might wish to enter into a distribution use of system agreement or connection agreement with the DNO. However, while we produce and publish a summary LTDS on our website, from a security perspective, we have particular concerns about making the full version available online – particularly for the EDF Energy Networks (LPN) network, where we have been advised by our security section not to publish large scale plans.

Currently, we ask applicants to apply for a copy of our LTDS via our LTDS coordinator, who can, if suspicious, verify the identity of the applicant.

Providing a schedule of generators connected to the network

We have a concern as to whether we are entitled to provide a schedule of named generators who are connected to our networks, without their permission. Therefore, it is our view that this data should be anonymised before it is published.

More frequent than annual updates to the LTDS in light of any significant changes

We consider that the connection of significant levels of additional load or generation would be the only circumstance in which we would update our LTDS more frequently than once a year. However, it would be difficult to continually update the underlying network data, and therefore, if this proposal is taken forward we would suggest providing a six-monthly update. It would not be practicable or reasonable for us to update our LTDS any more frequently.

Should you require any further clarification about this response, please contact me on 01293 657853.

Yours sincerely

Paul Measday
Regulation Manager
EDF Energy Networks