

Whilst the consultation to date has been far from perfect, it is apparent that there has been engagement with customers, albeit belatedly in June/July 2010. Such customer engagement (in respect of three of our five sites) has resulted in illustrative charges being amended, presumably following our comments during this consultation.

Within our original consultation feedback was a comment that there had been a lack of engagement prior to June 2010 and at that stage we were only afforded four weeks to respond. During that period there was engagement by way of workshops and the consultation response itself. Although the consultation document was difficult to understand, we do feel that such engagement has resulted in more sensible revised illustrative charges in the latest DNO proposals in respect of two of our five relevant sites for which the initial proposals represented in our view the most unjustifiable changes.

Ofgem's letter dated 20th August suggests a requirement for DNOs to consult with customers on the EDCM before Christmas with a further Ofgem consultation to conclude by May 2011. We believe that DNOs have already consulted (in June/July 2010). We agree that further consultation is required, including the need for DNOs to explain the changes they have made (between the latest and previous illustrative charges) but do not believe that this requires an extension to the original timetable.

Our recommendation is that DNOs should submit to Ofgem their proposals in line with the original 1st September deadline and that Ofgem should then issue its consultation document at the same time as the DNOs issuing their latest proposed illustrative charges, so that the two sets of documents can be reviewed in parallel. We believe that the Ofgem consultation document will be difficult to respond to in isolation and that customers will require the specific individual charges to make meaningful comments. On this basis we believe that the original timetable is achievable. The only proviso to this is that we are unable to determine or comment upon whether all potentially affected customers have been engaged in the consultation process to date and we suggest that Ofgem gets assurances on this point from DNOs/ENA, which should have information on the number of responses received to date.

In summary, our view is that Ofgem should continue with its original timetable with implementation on 1st April 2011 and work with the DNOs to ensure that customers remain engaged in the process.

Regards

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