

ESBI Investments, 3rd Floor, Regent's Place, 338 Euston Road, London NW1 3BT, England.
Tel: +44 (0) 207 544 8631 **Fax:** +44 (0) 207 544 8580 **Web:** www.esbi.ie

Rachel Fletcher
Partner, Distribution
Ofgem
9 Millbank
London
SW1P 3GE

26 August 2010

Dear Rachel,

Consultation on revised submission and implementation dates for EHV Distribution Charging Methodology

ESBI is pleased to respond to Ofgem's consultation on its intentions to derogate DNOs from licence conditions requiring them to submit EHV charging methodologies on 1 September, therefore delaying the introduction of the EDCM until 1 October 2011.

We agree that there remain material issues to be resolved before the final methodologies are introduced and that allowing the DNOs derogations from the relevant licence obligations is a pragmatic approach to adopt. We will continue to contribute to the ongoing industry processes facilitating the development of an effective enduring regime. Further, we would urge Ofgem to continue its important role in facilitating the introduction of robust and non-discriminatory charging arrangements for all distribution connected parties.

Please feel free to contact me, should you wish to discuss this response further.

Yours sincerely,

Michael Dodd
GB Regulation Manager

ESBI Investments

Email: michael.dodd@esbi.ie

ESBI Investments is a trading name of ESB International Investments Limited.

Directors: John McSweeney, Suzanne Ward, Paul Tobin, John Redmond.
Registered Office: Stephen Court, 18-21 St. Stephen's Green, Dublin 2, Ireland.
Registered in Ireland No. 137736

