



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

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T: 0141 568 4748

Submitted by email to distributionpolicy@ofgem.gov.uk

F: 0141 568 4499

Dear Ms. Fletcher,

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

Thank you for the opportunity to respond to this consultation of 20 August 2010. I am pleased to submit this response on behalf of ScottishPower Renewable Energy Ltd.

ScottishPower Renewables (SPR) agrees with and supports Ofgem's 'minded to' position of instructing the DNOs to hold off submitting their EDCM proposals until 01 February 2011 with the new charges being implemented on 01 October 2011.

Given the complexity of the proposed arrangements, it is important that wide ranging and open consultation is arranged by the DNOs to give users sufficient information and opportunity to consider the proposed arrangements and assess the impact for their businesses. Such consultation is key to reducing regulatory risk, which otherwise could have a detrimental effect on confidence in investment in distributed generation.

We hope our response and comments are helpful but please contact me if you would like to discuss or clarify any aspects of them.

Yours sincerely,

Allan Kelly
Regulatory Policy Manager
ScottishPower Renewables