

Inveralmond House 200 Dunkeld Road Perth, PH1 3AQ Telephone: 01738 456571 Facsimile: 01738 456415

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

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Dear Rachel,

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

SSE welcomes the opportunity to comment on the proposed revised submission and implementation dates for the Extra High Voltage (EHV) Distribution Charging Methodology (EDCM).

All the DNOs have worked closely, with Ofgem, to meet the 1 September 2010 and 1 April 2011 deadlines. However, it is clear that a number of issues need to be addressed, particularly around scaling. We are very keen to ensure that our customers are fully informed of any proposed changes, in sufficient detail and in a sufficient timescale to allow them to comment and adjust to the them. It is clear to us that the 1 September date will not provide customers with the required visibility or time to respond to the DNOs or Ofgem.

As such we believe that the pragmatic and proportionate way forward is to derogate the DNOs from the current deadlines. We therefore support Ofgem's proposal to set 1 February 2011 as the new deadline for DNOs to submit the EDCM and implement the new charges by 1 October 2011.

Yours sincerely,

Malcolm J. Burns Regulation Manager