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Our ref

Your ref

Date

22 June 2010

Dear Gareth

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

I am writing on behalf of Western Power Distribution (South West) plc and Western Power Distribution (South Wales) plc, ("WPD"), in response to Ofgem's consultation on Long Term Development Statements (LTDS).

We have some comments on the issues raised in the consultation letter.

Common electronic format

WPD already publishes data in spreadsheet formats (ie not just PDFs), that meets the original Form of Publication agreed. We would be happy to review this format and agree a revised format as appropriate.

LTDS website availability

At the request of Ofgem and users WPD have already adopted a free internet download facility with a simple registration system to record those persons requesting infrastructure details. We have previously discussed with Ofgem the need for a registration system and would not wish to change this arrangement.

List of generators connected to the network

WPD already provides a schedule of generators connected to the network and exporting more than 1MW. It would seem sensible to include a de minimus limit for any such list and we believe 1MW would be appropriate.

Interim LTDS updates

WPD does not support a requirement to update LTDS more regularly than once a year if there are significant changes to the network.

We usually do an annual reconciliation of data/systems to produce LTDS data, and would not want to go through this more frequently as this task



takes a few man weeks. In any case our LTDS identifies future changes/sanctioned works on the network.

We understand there is desire for DNOs to provide visibility of generators accepting Offers and possibly fully utilising parts of the network. We would be happy to look at publishing a list of generators who have Offers but not yet connected. We would endeavour to update this schedule every 6 months, and this could include it's network connection point/location.

Stakeholder Seminar

If Ofgem holds a stakeholder seminar, WPD would like to attend.

I hope these comments are helpful.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AS', written over a light grey grid background.

ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager