

Roberta Fernie
Ofgem (Glasgow)

By email only

29 October 2010

Proposed licence modifications: governance arrangements for electricity distribution use of system charging methodology

Dear Roberta

On behalf of our four distribution licensees, thank you for the opportunity to comment on the above proposed licence modifications. We have two items of feedback which are set out below:

- On page two of your covering letter the first bullet in the summary list states that under SLC22A Ofgem will positively direct a licensee to implement a change whereas the draft SLC22A.17 operates in reverse whereby a licensee must implement a change unless the Authority directs otherwise in the specified timescales. This contradiction needs removing and other changes checked to ensure the inconsistency does not appear elsewhere.
- The proposed implementation date leaves no time for a DCUSA change – it would lead to only three weeks including the Christmas break for the change to be raised, consulted and voted on followed then by issuing to Ofgem for decision. Accordingly delaying the implementation date by one or two months seems pragmatic.

If you have any queries on the above please do not hesitate to contact me.

Yours sincerely

Paul Measday
Regulation Manager
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