From: Richardson, Natasha E. **Sent:** 29 September 2010 13:31

To: Roberta Fernie;

Subject: RE: Proposed modifications to the distribution standard license conditions

Dear Roberta & Jessica

WPD has no issues in principle with the drafting.

But I have some suggestions to improve clarity.

- 1. I would suggest moving 22A.18 into Part C, after 22A.11. As this is also an obligation of the licensee.
- 2 22A.17 is a transitional provision to cover modifications raised before 31 December 2010. As this provision is time limited, it would be much clearer to users if this paragraph was headed "Transitional Arrangements". Perhaps with additional clarity, there could be an additional paragraph to state that it ceases to have effect on 30th December 2010.
- 3 Para 22A.17 refers to Part D of Condition 13A. This appears to have been deleted. I think you need to bring in the wording from Part D of 13A into 22A.17.

Subject to these comments, we do not consider that a workshop is necessary as the draft modifications are consistent with Ofgem's policy.

I hope this is helpful

Regards

Natasha Richardson Regulatory & Government Affairs Adviser 0117 9332382