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Roberta Fernie
The Office of Gas and Electricity Markets
107 West Regent Street
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15 December 2010

Dear Roberta

Notice of proposed modification of the standard conditions of electricity distribution licences under section 11A of the Electricity Act 1989

I am writing on behalf of CE Electric UK Funding Company (CE) and its wholly-owned electricity distribution licensees Northern Electric Distribution Limited (NEDL) and Yorkshire Electricity Distribution plc (YEDL). This letter provides our response to your e-mail of 17 November 2010 attaching Ofgem's S11A notice relating to standard conditions 13, 13A, 22A, 50 and 50A of the electricity distribution licence.

I am duly authorised to advise you that we do not wish to raise an objection or make a formal representation in respect of these proposed licence modifications.

Notwithstanding this, we have identified a number of minor issues in the drafting that Ofgem will no doubt wish to address, as follows:

- In the first line of paragraph 13.14(c) of standard condition 13 there is an erroneous reference to "standard condition 22A.18": there is no such standard condition. These words should be expanded to "paragraph 22A.18 of standard condition 22A".
- The new paragraph 22A.12 in standard condition 22A may not go as far as Ofgem would wish. The only obligation stated in that paragraph is to "develop arrangements" – ie there is no obligation to implement those arrangements.
- In the final line of paragraph 22A.17 of standard condition 22A, "part D" should be changed to "Part D".
- In paragraph 50A.38 of standard condition 50A, there may be an unnecessary second space between "Part C" and "of" in the third line and between "for" and "such" in the fourth line.
- In the first line of paragraph 13B.6 of standard condition 13B (as appended to standard condition 50A), there appears to be an additional unnecessary space between "the" and "following".

Yours sincerely

Tony Sharp

T H Sharp

Regulation Manager

CE ELECTRIC UK FUNDING COMPANY

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