

Chris Chow Ofgem 9 Millbank London SW1P 3GE Your ref

Our Ref

Date

15 December 2010

Contact / Extension Scott Mathieson 01698 413475

## Dear Chris

Consultation on proposed licence modifications: revised delivery dates for the EDCM and changes to the charging boundary between higher and lower voltages

I am writing on behalf of SP Distribution and SP Manweb in response to the letter and formal licence modification notice issued on 17 November 2010.

We have one representation on the proposed changes as follows.

In standard condition 50A.17, the final section after "1 April 2011" now reads "... in accordance with the direction issued by the Authority pursuant to Part J of this condition on 30 September 2010." We ask that the text in italics be removed, as that direction was a derogation from the timescales previously in force. A similar point applies to paragraphs 50A.18.

We will comment separately on another set of proposed licence modifications ("governance arrangements for electricity distribution use of system charging methodology") which are intended to take affect from 1 April 2011, but amend a number of the conditions covered by this licence modification notice.

For the avoidance of doubt, we do not object to the proposed licence modifications.

Yours sincerely

Scott Mathieson

Regulation and Commercial Director

New Alderston House, Dove Wynd, Strathclyde Business Park, Bellshill, ML4 3FF

Telephone: 01698 413000, Fax: 01698 413053