

Roberta Fernie  
Ofgem  
197 West Regent Street  
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Your ref

Our Ref

Date

15 December 2010

Contact / Extension

Scott Mathieson

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Dear Roberta

**Consultation on proposed licence modifications: governance arrangements for electricity distribution use of system charging methodology**

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 note that licence changes have been proposed in relation to revised delivery dates for EDCM and the new charging boundary, to take effect from mid-December. These relate to a number of the same conditions covered by the modifications now proposed, so that the current proposals would need to take those amendments into account. We would support a rationalization of the relevant licence conditions relating to charging methodology and governance in due course.

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

Yours sincerely



Scott Mathieson  
**Regulation and Commercial Director**

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