

Ynon Gablinger
Distribution Policy – Local Grids
Ofgem
9 Millbank
London
SW1P 3GE

Your ref 67/11

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24th June 2011

Dear Ynon

EDCM: DNO's proposals for the higher voltages - Timescales

RWE npower welcomes the opportunity to comment on these proposals. This response is provided on behalf of the RWE group of companies, including RWE Npower plc, RWE Supply and Trading GmbH and RWE Npower Renewables Limited, a fully owned subsidiary of RWE Innogy GmbH.

You have asked for early comments on the implementation timescales for EDCM.

Generation:

There are many unresolved issues in this area, particularly around pre-2005 connected DG. We would therefore prefer that implementation is delayed for **all generation tariffs** until these issues are progressed. We would suggest that this is delayed until RIIO ED1 (2015). We do not believe it would be appropriate to implement post and pre 2005 DG at different times. It would be a much cleaner solution for all generation EDCM to be implemented on the same date.

Demand:

We would support earlier implementation of EDCM for demand customers – either April 2012 or April 2013 since this is beneficial to the majority of customers.

We will provide additional comments on the consultation by 4th July 2011.

By email so unsigned

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