

Hannah Nixon
Ofgem
Millbank
London SW1P 3GE

Duncan Burt
Customer Services Manager

Duncan.burt@uk.ngrid.com
Direct tel +44 (0)1926 656703
Direct fax +44 (0)1926 656605

www.nationalgrid.com

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Dear Hannah

Project TransmiT: conclusions on connections issues and statutory consultation on timely connections reporting obligation

Thank you for the opportunity to provide our views on the timely connections reporting obligation to be added to our licence in Condition C8 and the equivalent provisions to be inserted in condition D4A of the Scottish Licensees' licences.

This response is provided on behalf of National Grid Electricity Transmission plc (NGET), the owner of the electricity transmission system in England and Wales and the National Electricity Transmission System Operator.

We continue to support the development of the regulatory framework to ensure customers are provided timely connections. We are therefore supportive of the introduction of reporting obligations which will help Ofgem to monitor connection timescales and also inform industry considerations as to whether further developments to the connections framework are required.

Whilst we are supportive of the introduction of this reporting requirement, we believe that the accompanying proposed licence drafting does not fully meet the objectives of the consultation. The three areas we believe require amendments to the proposed drafting are set out below, Appendix 1 (attached) sets out amended drafting which address these.

- Clarifying what information is required to be set out in the report (e.g. limiting each report to only covering the previous six months);
- Only obligating the licensees to providing the Authority with information in their possession; and
- Creating a mechanism which ensures that NGET is not required to publish the non-confidential version of the report prior to receiving the required information from the Scottish Licensees.

It is our understanding that should a timely connections reporting obligation be implemented, that this would be done in a way that did not introduce a reporting requirement on offers made prior to the direction. We would therefore request that any such direction includes the date of when the first report is required and that such date is not before October 2012.

I hope that this letter and appendix provide useful suggestions of how the licence drafting could be fine tuned to better meet the intent of your consultation. If you would like to discuss any of the issues raised in more detail then please feel free to contact myself or John Perkins (01926 656337), who will be able to answer any questions you may have.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Duncan Burt', with a stylized flourish at the end.

Duncan Burt
Customer Services Manager

By E-mail

Appendix 1: Suggested amendments to proposed Licence text for Condition C8

12. The Licensee **shall, not more than 28 days** after the end of the following periods:

(a) 1 April until 30 September; and

(b) 1 October until 31 March,

submit to the Authority **in a form approved by the Authority** a report in relation to all offers made under paragraph 3 of this condition **during the relevant period**, setting out the factors which have influenced the date identified in each offer in accordance with paragraph 3(e) of this condition including the following **(where relevant and to the extent that such information is available to the licensee)**:

- (i) information on **the date identified in each offer**, and how this may vary by location and size of connection;
- (ii) key issues that impact or have impacted the date identified by the licensee in its offer in accordance with paragraph 3; and
- (iii) any issues likely to impact the timing of connections in the future.

13. A non-confidential **combined** version of the report **submitted to the Authority by the licensee and the reports provided to the licensee by the Scottish licensees under paragraph 6 of condition D4A (Obligations in relation to offers for connection etc.) of their respective licences** must also be published by the licensee **not more than five working days after the later of**:

- (i) **the receipt of the last of those reports by the licensee; and**
- (ii) **the date by which the licensee is required to submit its report to the Authority pursuant to paragraph 12.**

Note: Should Ofgem decide to make any changes to paragraph 12 of Condition C8, we believe that corresponding changes would also be required to paragraph 5 of Condition D4A of the Scottish Licensees' licences.

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