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Registered in England and Wales No: 3870728

Andy Burgess
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Ofgem
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London
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By email only to connections@ofgem.gov.uk

28 March 2012

Dear Andy

Consultation on proposed licence changes to facilitate open governance of the Common Connection Charging Methodology

Thank you for the opportunity to respond to the above consultation. This response should be regarded as a consolidated response on behalf of UK Power Networks' four electricity distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, South Eastern Power Networks plc, and UK Power Networks (IDNO) Ltd. I can confirm that this response is non-confidential and can be published via the Ofgem website.

We are broadly comfortable with the drafting and our only query is in respect of the implementation dates. This is outlined in the appendix to this letter where we have answered your specific questions. If you have any questions please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Hutton', written over a light blue horizontal line.

Keith Hutton
Head of Regulation

Copy Paul Measday, Regulatory Returns & Compliance Manager
Rebecca Langford, Ofgem

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Appendix

Views were requested on the following subjects in italics:

Whether changes to the Licence are required to address the issues set out [in the letter] and at Appendix 1

We support the introduction of changes to the distribution licence to facilitate open governance of the CCCM and also undertake house keeping updates.

Whether there are any other issues associated with open governance of the CCCM that require further changes to be made to the Licence

We do not believe that there are any other issues over and above those dealt with in your letter that need to be dealt with at this time.

Whether respondents have any views on the proposed Licence drafting set out at Appendix 27 including whether alternative drafting for these conditions is more appropriate

Our only concerns at this stage are highlighted below regarding implementation of the changes and its feed through into DCUSA.

Our process and timetable for taking forward the Licence changes

We note from your covering letter the desire to implement the changes to the licence from 1 August 2012. We support this target and will work together with Ofgem and other DNOs to achieve this. However, we are unclear in respect of the process and dates that the industry will need to work to so that the DCUSA modification process can be set in motion to also meet this target date. For example, if Ofgem publishes its decision to implement the licence change (following the statutory consultation) well in advance of 1 August there should be time to allow a DCUSA change to be processed. However, if the decision is published on or immediately before 1 August, this may place an unnecessary strain on the DCUSA processes to effect the consequential changes.