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Our ref

Your ref

Date

11 September 2012

Dear Simon

Consultation on charging methodology for higher voltage distributed generation

Please see attached response on behalf of Western Power Distribution.

If you have any queries or would like to discuss this further please contact Simon Yeo, Income & Connection Manager at syeo@westernpower.co.uk or on 0117 9332349

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager

Consultation on charging methodology for higher voltage distributed generation

CHAPTER: One

Question 1: Have the options available to pre-2005 generators been clearly explained to those generators?

Yes

Question 2: What information (or guidance) about the EDCM would be of use to industry participants, and what do DNOs and generation customers think could be provided?

Due to the complexity of the subject, bi-lateral discussions between affected parties and DNOs are possibly the most productive guidance that can be provided. If there are large numbers of these then it the process would need to be reviewed.

CHAPTER: Two

Question 1: Do you think that the proposed methodology includes the relevant issues, and has not omitted any relevant issues?

Yes

Question 2: Do you agree with our understanding that the interactions between super-credited credits for intermittent generators and Engineering Recommendation P 2/6 could result in demand customers paying for credits when no network benefit is recognised under the planning standard?

Yes – but we feel that intermittent generators contribute at a remote level.

Question 3: Is the treatment of sole-use asset costs appropriate?

Yes

Question 4: Is the calculation of the revenue pot appropriate, in particular the approach to the DPCR4 contribution, and proposed figure for the O&M rate?

Yes

Question 5: Is the approach to allocation of the revenue pot appropriate?

Yes

Question 6: Do you have any views on the calculation of LDNO charges through the extended "Method M" for CDCM-like customers, and through the separate methodology for EDCM-like customers?

None

Question 7: Do you have any other comments about the issues that we have noted, or about any other points?

No

Question 8: Is it appropriate for us to approve the methodology?

Yes

Question 9: Is it appropriate for us to place the potential condition that we have suggested, and are there any other conditions that respondents feel would help to better meet the Relevant Objectives?

No – but we feel that intermittent generators contribute at a remote level.

Question 10: Do you think that we have identified the important impacts in our Impact Assessment?

Yes