

Nicholas Rubin
Local Grids – Distribution Policy
Ofgem
9 Millbank
London
SW1P 3GE

31 August 2011

Dear Nicholas

EHV Boundary Definition – Statutory Consultation on Proposed Licence Modification

CE Electric UK Funding Company (CE) is the UK parent company of Northern Electric Distribution Ltd (NEDL) and Yorkshire Electricity Distribution plc (YEDL).


On 2 August 2011 Ofgem published a notice pursuant to section 11A of the Electricity Act 1989 of its intention to modify standard conditions 13A and 50A of the Electricity Distribution Licence to revise the definition of the EHV boundary.

I confirm that neither NEDL nor YEDL objects to the proposed modifications being made.

We would, however, make the following comments that we would like Ofgem to take into account in its implementation of the proposed modifications.

- (i) SLC13B will be incapable of standing on its own once SLC50A disappears from the licence (currently expected to be 1 April 2012). SLC13B will require changes that are similar to ones made to SLC13A following representations we made about the consequential effects of SLC50 having lapsed. We recognise that this does not need to be done now, but it will have to be done before SLC50A is removed.
- (ii) There are some minor typographical errors that should be corrected before the modifications are made, i.e.
 - At the start of the second line of paragraph 13A.10 of the SLC13A and of paragraph 13B.11 of SLC13B, ‘which’ should be changed to ‘that’.
 - In the third line of the definition of ‘LDNO Asset Ownership Boundary’ in paragraph 13A.15 of SLC13A and in paragraph 13B.16 of SLC13B, the comma after ‘System’ should be deleted.
 - At the end of the third line of paragraph 50A.22 of SLC50A, ‘which’ should be changed to ‘that’.

Yours sincerely



John France
Regulation Director

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