

Ms Dora Guzeleva Head of Network Policy: Local Grids Ofgem 9 Millbank London SW1P 3GE

1st February 2013

Dear Dora

Revision of Governance for Low Carbon Networks Fund - electricity demand

EA Technology welcomes the opportunity to respond to the consultation 'Low Carbon Networks Fund – Electricity demand'.

As an active partner of the bidding and delivery of the 'Customer Led Network Revolution' project (CLNR), 'New Thames Valley Vision' project (NTVV), and most recently awarded 'I²EV' project, we are a firm supporter of the objectives of the Low Carbon Networks Fund (LCN Fund).

It is our belief that the LCN Fund is instrumental in driving the development of innovative technologies and improvements to allow networks to meet the challenges of a low-carbon future in a timely fashion. However we acknowledge that the first tier of the LCN Fund does not, currently allow for projects that trial electricity demand reduction or shifting of demand amongst customers.

The first tier of LCN funding provides a valuable opportunity to trial new technologies and / or techniques that are not yet commercially available at scale, or where the technological/commercial risk may be greater. In order to do this successfully, it is important that the opportunity to control demand be made available, which may, necessarily, have to reach beyond the DNO network (i.e. into a customer's home or business).

Under the present governance arrangements, such schemes can only be trialled as part of a second tier LCN Fund project. The scale and scope of bidding and delivering such projects is likely to preclude smaller trials that may otherwise yield solid learning on either customer acceptance or the network benefits of demand side response measures.

It is therefore the view of EA Technology that the first tier of the LCN Fund is ideally suited to facilitate such trials; any equipment necessary to provide customer demand response should be eligible under the funding mechanism.

In summary we agree with the consultation; that such projects are crucial in providing valuable learning to DNOs and wider industry stakeholders, and therefore welcome the proposed change to LCN Fund governance. After review of the proposed changes to criteria, it is our view that the revised drafting sufficiently defines and allows for the conditions under which demand-side response measures, such as a reduction in or shifting of demand, may be undertaken within a first tier LCN Fund project.

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Should you wish to discuss our response to the proposed changes in LCN Fund governance any further, or any points raised above, please do not hesitate to contact me at <u>davea.roberts@eatechnology.com</u>, or by telephone on 0151 347 2318.

Yours sincerely

Dave A Roberts Future Networks Director



