

Andrew Burgess  
Ofgem  
9 Millbank  
London  
SW1P 3GE

5 April 2013

Dear Andrew

**Low Carbon Networks Fund: version six of the Low Carbon Networks (LCN) Fund  
Governance Document**

Thank you for the opportunity to comment on the above consultation. I am writing on behalf of our three distribution network operators: Eastern Power Networks plc, London Power Networks plc and South Eastern power Networks plc. They are referred to as UK Power Networks in this response.

We have reviewed the proposed changes and are broadly comfortable with them however there are three proposed changes which we are unclear on:

- On page 30 under tier 1 projects, section 5.4 about informing Ofgem of delayed projects has been removed. We are unclear of the reasons behind this.
- On page 53 under tier 2 projects, section 3.31 has been expanded to require eight ring bound copies within 48 hours of the 1700hrs Full Submission deadline. We are unclear on three aspects of this:
  - Firstly the need for eight printed copies by the submitting DNO. We believe that printing as required and in the format preferred by the end user (Ofgem and assessing bodies) might result in more sustainable use of paper and will save the transport costs for the hard copies submission;
  - Secondly the wording around “ring bound” could be misleading and may better be worded as “appropriately bound” or by further defining the binding requirements; and
  - The 48 hour extension to submit the printed copies does not take into account weekends and bank holidays. We believe that “by 1700 hours on the second working day after the date of the Full Submission” is a more robust wording.
- Finally, on page 59 under tier 2 projects, section 3.67, regarding the number of person days and day rates, has been introduced. It is unclear whether this information must be provided as part of the Full Submission pro-forma or the Full submission document and we believe that further clarity should be provided in this respect.

I hope the above feedback is beneficial. If you have any queries please do not hesitate to contact Paul Measday in the first instance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Hutton', written in a cursive style.

Keith Hutton Head of Regulation  
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks  
Arun Pontin, Ofgem