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28th March 2013

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

Dear Dora,

Low Carbon Networks (LCN) Fund: content and structure of second tier closedown Reports

I am writing to you on behalf of Northern Powergrid Holdings Company and its wholly owned electricity distribution licensees Northern Powergrid (Northeast) Limited and Northern Powergrid (Yorkshire) plc. This letter provides our response to Ofgem's recent consultation on the content and structure of LCNF second tier closedown reports.

We support your approach of basing the format of the 2nd tier reports on the tried and tested 1st tier report structure, and consider the clear distinction between the purpose and content of progress reports vs. closedown report appropriate and helpful.

In response to your specific questions:

1. *Is the structure outlined in Annex 1 sufficient for second tier closedown reports, or should we require information on further areas?*

Yes, we consider the structure outlined to be sufficient. Our only concern would be that for larger or more complex projects, length and readability may be an issue, but that this could be simply addressed by proportionate use of appendices as determined by the author. We note that 1st tier closedown reports have used appendices and would recommend that the same flexibility is also available for 2nd tier closedown reports.

2. *Should there be a requirement for DNOs to consult with other DNOs on their closedown reports before publication?*

Meaningful engagement is critical to maximising the value delivered by LCNF projects, enabling DNOs to embrace the learning generated. The time for engagement on the learning arising and the form of the outputs is throughout the lifetime of the project rather than via a closedown report. Meaningful engagement is achieved through information sharing activities

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and interaction between DNOs and projects rather than by report reading. Meetings between Northern Powergrid and WPD to discuss proposed planning and design tools, NPADDs and SIM, are an example of this. Meaningful engagement can be required and encouraged through SDRC which specifically address this issue. Our view is that requiring consultation on the closedown report is likely to complicate the process of closing down the project for only marginal benefit. The prescribed structure in itself provides a good level of assurance that the report contains all the relevant information and DNOs, and indeed other interested parties, can contact the authoring DNO for further clarification if required. Providing contact details within the report would facilitate this process.

I hope you find these comments useful. If you have any questions arising from this response, please do not hesitate to make contact.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Liz Sidebotham', with a stylized, cursive script.

Liz Sidebotham

LCNF Communications and Compliance Manager