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Ofgem

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Dear James

www.ukmajorports.org.uk

Response to Consultation on Distribution Connection Use of System Agreement (DCUSA) change proposal (DCP) 124: Third Party Network - National Terms of Connection

I wrote to you on 7 March about concerns which several of our members had with DCP 114 and 115 Change Proposals. One particular difficulty was that although ports are major private network operators we were not being notified of DCUSA change proposals.

We do now seem to be on the distribution list for DCUSA proposals which is welcome. However I see from the recent responses to the above consultation on DCP 124 from Forth Ports and Peel Ports that there still appear to be significant issues for ports in terms of the clarity and comprehensibility of the change proposals and the extent to which they take account of the particular circumstances of ports as major private network operators. As a consequence many of the changes proposed are too widely drawn, highly complex and not at all suited to the needs of ports or their customers.

I do hope that Ofgem will pay close attention to the concerns set out in these responses. In addition there is a wider point about the extent to which the position of ports and indeed of private network operators more generally is being recognised in the preparatory work which underpins DCUSA change proposals. It would be much better if these issues were properly addressed early on rather than at the final consultation stage where there is often a shortage of time and insufficient room for manoeuvre. The challenge as always is to find a way of doing this which does not put undue strain on very busy people.

I wonder if it might help if I and a few industry colleagues came over to Ofgem for a discussion with you about the way forward sometime during the next few weeks? If you agree, we can fix a mutually acceptable date and time.

With best wishes

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Bird', is written in a cursive style.

RICHARD BIRD
UKMPG Executive Director

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