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Tim Aldridge  
Distribution Policy  
Ofgem  
9 Millbank  
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By Email only

22 January 2014

Dear Tim,

**Publication of additional information on data cleansing**

Thank you for the opportunity to comment on the data provided by suppliers relating to data cleansing activities.

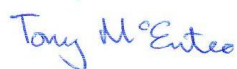
In our earlier consultation response we expressed doubts that it would be possible to draw quantified conclusions from any data that suppliers were able to provide at this stage; we have seen nothing in the recently published data to change this view.

Our analysis has summarised the correction volumes at a high level, by GSP Group area and by the regulatory year. It is clear from this that the data is incomplete. We understand that not all of the big six suppliers have provided data, and that those that did respond to Ofgem's request have not been able to provide all data, particularly for the early years. In fact it is only the North Western Group that is populated with any significant data volumes in any of the first three years of DPCR4; however these volumes bear no relation to the total reconciliations that were reported in settlements.

Given that the data is demonstrably incomplete, and in particular the absence of data in the early years, it is hard to see how it can be used in any way as additional evidence, whether in support or against the restatement submissions by Northern Powergrid or Western Power Distribution. We would expect to see a complete, fully audited, data set if any reliance on this data is to be taken.

If you would like to discuss these points in more detail please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink that reads "Tony McEntee".

Tony McEntee

**Head of Connections**

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