



James Veaney
Head of Distribution Policy
Ofgem
9 Millbank
London
SW1P 3GE

E.ON UK plc
Westwood Way
Westwood Business Park
Coventry
West Midlands
CV4 8LG
eon-uk.com

Leonida Bandura
T 02476 182536
Leonida.Bandura@eon-uk.com

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Re: National Grid Transmission: Proposed Statement of Works Trial

Dear James,

Thank you for the opportunity to respond to the above consultation. This response is made on behalf of E.ON UK plc.

Do you understand NGET's proposal?

We understand the proposal and the reasons for NGET suggesting this trial period rather than undertaking a formal CUSC Modification.

What is your view on the usefulness of the proposal and its perceived benefits?

By removing Stage 1 in the Statement of Works (SoW) process this will reduce the amount of time it takes for a developer to receive a connection offer from the DNO. The removal of this administrative step will also mean a slight reduction in the cost of connection. By moving straight to Stage 2 of the process this will presumably mean that the Modification Application fee associated with the Confirmation of Project Progression would also be immediately payable by the embedded generator requesting a connection. This could have the benefit of reducing the number of speculative applications being submitted in constrained areas.

Do you have any concerns with this proposal?

Stage 1 will be omitted where "*...the DNO knows from the outset that the connection will have an impact on the transmission system*" the SoW process and requirements vary by location. Although it may be fairly obvious for the Scottish DNOs when assessing this as to which process they should follow, this could mean borderline situations in other DNO areas could be open to a potentially more expensive process. For example a DNO may believe that a connection will have an impact on the transmission system and submit a Confirmation of Project

E.ON UK plc
Registered in
England and Wales
No 2366970

Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG



Progression to NGET, incurring a Modification Application fee when in fact a SoW would have shown that no transmission works are required. We would like to understand how projects such as these will be treated during the proposed trial period.

Section 6.5.5.5 of the CUSC states that "The Confirmation of Project Progression together with the information included in the Request for a Statement of Works...shall be deemed to be a Modification Application for the purposes of the Charging Statements"

We would like to understand the process by which the DNO, and presumably the developer in turn, will be invoiced for this, particularly how the timing of the connection offer will be managed. As the aim of the proposal is to improve the application process, we would expect NGET and the DNOs to work to a set timescale in order to provide transparency and predictability for developers.

I hope the above comments prove helpful.

Yours sincerely

Leonida Bandura
Project Developer