

British Gas 1st Floor, Lakeside West 30 The Causeway Staines Middlesex TW18 3BY

Raymond Elliot Ofgem 9 Millbank London SW1P 3GE

11 December 2014

Via email only

Dear Raymond,

Consultation on a proposed licence modification to set objectives for the Master Registration Agreement

Thank you for your consultation on the proposed Electricity Distribution Licence change, to insert objectives of the Master Registration Agreement (MRA) into Standard Licence Condition (SLC) 23.

You state that the intent is to make the MRA decision-making more transparent and bring the Agreement into line with other industry codes. We agree that this change should achieve those objectives

Therefore we broadly support the Licence change, although we note the MRA has functioned adequately for many years without these objectives.

Question 1: Do you agree with the drafting of the proposed objectives in Appendix 1?

Yes, we agree with the drafting of the proposed objectives. They align with other code objectives, which will help drive consistency across the Code Modification processes.

Question 2: Do you agree with the proposed changes to the decisionmaking, reporting and appeal provisions?

Yes, we support and agree with the proposal. The MRA considers change proposals against these proposed objectives today, but establishing them in the Licence this will formalise that process.

Question 3: Do you agree with the proposed deletions of SLCs 23.3(f) and 23.4, given that these matters will be covered by the new objectives?

Yes, we support these deletions.

Question 4: Do you think it is necessary to have a specific objective (SLC 23.3A(f)) covering the MRA interactions with the Green Deal? If so, do you agree with the proposed drafting of SLC 23.3A(f)? If not, how could these interactions be accounted for under the other proposed objectives?

We agree with Licence Condition F and how it covers the interaction between the MRA and Green Deal.

Question 5: Do you have any other suggestions for the drafting?

We have no further comments at this time.

Please do not hesitate to contact me if you have any further questions.

Kindest Regards,

Andrew Margan Regulatory Manager British Gas Trading Ltd

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