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Dear Raymond,

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

Electricity North West is supportive of the proposal to include Master Registration Agreement (MRA) objectives into the Standard Licence Condition (SLC) 23. We have provided responses to the consultation questions and a general comment.

Consultation Questions:

Q1. Do you agree with the drafting of the proposed objectives in Appendix 1?

Electricity North West agrees with the drafting of the proposed objectives (a) to (e) in Appendix 1.

Q2. Do you agree with the proposed changes to the decision-making, reporting and appeal provisions?

We agree with the proposed changes to the decision-making, reporting and appeal provisions.

Q3. 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?

We agree with the proposed deletions of SLCs 23.3(f) and 23.4 as these will be covered off by MRA objectives (a) and (e) respectively.

Q4. 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 believe it is necessary to have a specific objective covering the MRA interactions with the Green Deal. There are a number of Green Deal obligations on Suppliers and Distributors which are not relevant to MRA objectives (a) to (e) for example; the Suppliers having to procure and maintain a Green Deal database and parties having to sign a Green Deal Central Charge Access Agreement. Modifications to these and other Green Deal obligations require a specific Green Deal objective.

Q5. Do you have any other suggestions for the drafting?

We do not have any suggestions for the drafting.

General Comment

We have identified an error in clauses 23.3c and 23.3g of the modification comparing it against the current licence. These clauses in the modification refer to the 'Central Change Database' when it is actually a 'Central Charge Database' as indicated in the Supply Licence and the definitions section of the Distribution Licence.

Yours sincerely

Joanne Fallows

MRA and SEC Contract Manager

Electricity North West Limited