

Clothilde Cantegreil
Senior Policy Analyst
Smarter Grids & Governance
The Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

19 January 2015

Dear Clothilde

RIIO-ED1: Notices under Section 11A(2) of the Electricity Act 1989

This letter and the attachment to it constitute the response of Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc to the notices published by the Gas and Electricity Markets Authority (GEMA) under section 11A(2) of the Electricity Act 1989 on 17 December 2014 relating to proposed modifications to the standard conditions of electricity distribution licences and to proposed modifications to the special (charge restriction) conditions of the electricity distribution licences held by licensees other than those within the WPD group, which seek to give effect to GEMA's final determinations for the RIIO-ED1 slow-track DNOs, published on 28 November 2014.

Northern Powergrid has taken an active part in the discussions at the Licence Drafting Working Group (LDWG) and fully supports the submission of even date made on behalf of the fourteen distribution network operators (DNOs) that are distribution services providers. This submission refers *inter alia* to possible version-control issues with the documents published for the statutory consultation: if Ofgem discovers discrepancies between the published and intended versions of the licence conditions that are to be the subject of the forthcoming modification, we would appreciate an opportunity to review these before the modification is made.

The attachment to this letter contains some comments of our own on the licence drafting that for the most part time did not permit us to raise with other DNOs. In presenting these comments this document is confined to those points that relate to the technical method by which the proposed licence modifications seek to implement the final determination. It should not be taken to imply acquiescence or otherwise in the substantive proposals made in the final determination, or in any decision GEMA may ultimately take to proceed with the proposed licence modifications.

Northern Powergrid has not repeated points or arguments that it has made previously in relation to the substantive proposals, notwithstanding that it considers those points remain valid, since our understanding is that it is not the purpose of this consultation further to debate the substantive proposals. If this does not accord with GEMA's understanding, however, then we can provide such points and arguments as necessary.

NORTHERN POWERGRID

is the trading name of Northern Powergrid (Northeast) Ltd (Registered No: 2906593) and Northern Powergrid (Yorkshire) plc (Registered No: 4112320)


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www.northernpowergrid.com

I hope that you will find these comments helpful. If you should require anything further in relation to them, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "John France". The signature is written in a cursive style, with the first name "John" and the last name "France" clearly legible.

John France
Regulation Director