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Registered in England and Wales No: 3870728

Raymond Elliott Ofgem 9 Millbank London SW1P 3GE

By email only to: <u>Raymond.Elliott@ofgem.gov.uk</u>

11 December 2014

Dear Raymond

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

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. Our response is not confidential and can be published via the Ofgem website.

Our answers to the consultation questions are set out in the appendix to this letter and we hope that you will find our comments helpful. If any part of our response requires further explanation or clarification please do not hesitate to contact me.

Yours sincerely

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Keith Hutton Head of Regulation UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

Return Address: Newington House 237 Southwark Bridge Road London SE1 6NP

## Appendix

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

## UK Power Networks' answers to the consultation questions

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

Yes, we agree with the drafting of these objectives.

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

Yes, we agree with the proposed changes to these provisions.

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 agree with the proposed deletions referenced above.

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?

While we believe that the new MRA objectives should be consistent with industry codes such as the DCUSA, we support the inclusion of the specific objective to cover MRA interactions with the Green Deal (SLC23.3A(f)).

To date Green Deal changes associated with the MRA have normally resulted from revisions to the Green Deal Arrangement Agreement (GDAA) and the inclusion of paragraph (f) will help ensure such changes can be made with a clear line of sight to the meeting of an objective in the licence.

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

No.