

James Veaney
Head of Distribution Policy
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Avonbank
Feeder Road
Bristol
BS2 0TB

Telephone 0117 9332175
Fax 0117 9332428
Email asleightholm@westernpower.co.uk

Our ref

Your ref

Date

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05 Jan 2015

Dear James

2014 Incentive on Connections Engagement (ICE) Guidance Document consultation

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc in relation to the above.

We welcome the updates which have been made to the Guidance Document and believe they improve the overall ICE process. In particular the move to a combined submission, with both Looking Forward and Looking Back sections, reflects the feedback we had from our stakeholders that separate submissions could reduce the quantity and quality of responses to the associated consultations due to stakeholders being overloaded.

We also welcome the inclusion of the clarity on DNOs not being penalised in the assessment of their ICE submission for failing to deliver stretching targets, providing that the risk for underachievement is understood at the outset and the reasons for not meeting the target are reasonable and well justified.

We look forward to the upcoming decision document and final wording of the ICE Guidance. As the ICE process progresses through RIIO-ED1 we think it would be worthwhile revisiting the ICE Guidance Document as learning is gained from each year's rounds of submission and assessment to ensure it continues to facilitate ICE submissions which draw strong stakeholder responses.

Should you wish to discuss any aspects of our response please do not hesitate to contact either myself or Richard Allcock on 01332 827503 (rallcock@westernpower.co.uk).

Yours sincerely



ALISON SLEIGHTHOLM
Regulatory & Government Affairs Manager