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31 January 2015

Dear Maxine

**Derogation from Standard Condition 24 (Distribution System planning standard and quality of performance reporting) of the Electricity Distribution Licence**

Rachel Fletcher wrote to DNOs on 8 July 2010 issuing a Direction to allow DNOs to self-derogate sections of their network where the demand is less than 60MW from the strict requirements of ER P2/6. The Direction expires at the end of March this year.

We believe that little has changed in the general background to the 2010 decision, and therefore a continuation of the Direction would be appropriate. Further, as you are probably aware, the industry has just started a formal review of ER P2/6, and the issue of smaller demand groups and how to deal with security requirements, will be included in that review. Gareth Evans is an adviser to the Distribution Code Review Panel working group undertaking the review.

In light of this, it would seem sensible to extend the Direction, and we would ask that you consider doing so, say until the end of March 2019. We would expect the review work to be completed in under three years, but March 2019 co-incides neatly with the ED1 midterm review.

If you want to discuss this proposal, please do not hesitate to contact me, or Mike Kay our Networks Strategy Director.

Yours sincerely

**pp Sarah Walls**  
**Head of Economic Regulation**

cc Gareth Evans