

## Anthony Mungall

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**From:** Guyatt, Richard <richard.guyatt@bonddickinson.com>  
**Sent:** 29 January 2015 17:31  
**To:** offshorelicensing  
**Cc:** Wex, Sara; Anthony Mungall  
**Subject:** Consultation on Proposals to modify Standard Licence Conditions 14 and 15 of the Electricity Generation Licence

Dear Sirs

Bond Dickinson LLP welcomes the proposed changes to the drafting of Standard Licence Conditions 14 and 15 proposed in your letter of 28 November 2014.

The inconsistency in drafting between Condition 14 and 15, and its impacts for the promoters of offshore generating stations has long been a source of concern for a number of our clients. We very much welcome the proposed changes therefore.

In regard to particular comments we would suggest:

### **Standard Licence Condition 14, paragraph 2(c)**

As well as the words already inserted by you we would suggest the word "use" is included after the word "installation".

In the last part of paragraph 2(c) the wording is not entirely clear. The wording may be improved by the insertion of the words "to be" before the words "carried out".

### **Standard Licence Condition 15, paragraph 2(c)**

As with Standard Licence Condition 14 we would recommend that at the end of paragraph 2(c) the words "to be" are inserted before the words "carried out". We would also recommend specific reference to environmental surveys as this is an area of some doubt:

"including, for the avoidance of doubt, environmental surveys and works preliminary to those activities, and whether those activities are to be carried out by the licensee or another licence holder"

The drafting otherwise seems fit for its intended purposes and is certainly an improvement on the previous Standard Licence Conditions.

We would be happy to assist further (and provide practical examples of the difficulties that have been caused to numerous of our clients as a result of the existing wording) should that be of benefit.

**Richard Guyatt**

Partner

for and on behalf of Bond Dickinson LLP

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