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Date: 29<sup>th</sup> January 2015

Dear Anthony,

**Consultation on proposals to modify Standard Licence Conditions 14 and 15 of the electricity generation licence**

Thank you for the opportunity to respond to the above noted consultation and for the proposals of provisions contained therein.

ScottishPower Renewables ("SPR") are comforted that Ofgem have confirmed its position and support for generation licence holders to compulsory acquire the rights for the electricity cables and lines required by that generation station which will ultimately be used, operated, maintained etc. by the relevant network owner.

SPR have a few minor proposals for amendment which we believe would further clarify the licence drafting:

Condition 14 2 (b)

Please consider to remove the word "and" as we understand that Ofgem want each of the powers to be capable of being exercised independently

Condition 14 3 (a) (i)

Please consider expanding this to clarify where a generator may be granted consent under the applicable Town and Country Planning Legislation in England / Scotland / Wales or under the Development Consent order.

Condition 14 3 (a) (ii)

Please consider removing the word "and" as it is not required and could lead to confusion.

Condition 15 2 (c) and 4 (b)

Please consider inserting the word "use" into the list of rights in these areas, e.g. "...replacement, use or removal of..."

If you would like further clarity on the above or have any queries to the points noted please contact me via e-mail or on either of the above numbers.

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**SCOTTISHPOWER  
RENEWABLES**

Yours sincerely,

Joe Dunn  
**Grid and Regulation Manager**