

By E-mail

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Your ref

Our Ref

Date

9th June 2015

Contact / Extension

Stephanie Rogan
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Dear Arun,

Informal Connections Code of Practice Licence consultation

We welcome the opportunity to comment on the proposed licence conditions and wish to make the following remarks:

1. The obligation on the licensee to “use best endeavours to manage and operate its Distribution Business in a manner that secures the achievement of the Relevant Objectives” is too wide and has the potential to introduce conflict with other licence duties.

We propose that this obligation be replaced with a best endeavours obligation to provide Input Services.

2. The definition of Input Services – only accredited parties can provide connections.
3. Although the term ‘Common’ suggests such, it is not transparent that this is a common document monitored by DNOs collectively so suggest adding the following wording:

“ 1.1 The licensee must:

(a) have and maintain, *in co-operation with all other Distribution Services Providers*, an Competition in Connections Code of Practice that is designed to facilitate the achievement of the Relevant Objectives set out in paragraph 1.2”

If you have any queries in relation to this response, please do not hesitate to contact me.

Yours sincerely,



Stephanie Rogan
Licence Analyst
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