



09 June 2015

Dear Mr Burgess,

Green Frog Power welcomes the opportunity to respond to Ofgem's consultation on the additional distribution licence condition.

In this response, Green Frog Power Ltd are representing ourselves and Green Frog Connect Ltd.

Green Frog Power builds and operates power stations in Great Britain, playing a key role in providing National Grid with fast responding back-up power when it's needed. We are a rapidly expanding business, and as such, we rely on Distribution Network Operators (DNOs) to help us achieve our business plans and strategies. Their efficiency has a direct impact on our business.

Green Frog Connect manages and constructs high-voltage connections to the grid. As an Independent Connections Provider (ICP), accredited by Lloyds Register, Green Frog Connect provide safe, reliable and cost-effective connections. To date, Green Frog Connect have successfully connected 577 Megawatts of generation to the grid and have a number of schemes still in design and construction. Green Frog Connect is the key interface with the DNOs and as such is closely involved with and very aware of the various aspects of getting connected. In this capacity, they are in a strong position to offer insightful perspectives on the operations of distribution connections from a client's perspective.

We are very supportive of the work being done in this area. Recent changes in the embedded generation landscape over the last few years, resulting from a shift toward a low-carbon policy landscape, has brought about a flourishing wind and solar industry. We agree with Ofgem that the Distribution Network market has not always matched that pace of progress and adaptation in all areas. Modifying the licence conditions to include a Code of Practice is excellent progress toward increasing the pace of improvement in this important area.

We agree with the level of prescriptiveness in the proposed drafting of the licence condition. The current drafting places an appropriate focus on general aspirations to Best Practice. We do not agree with some commenters that the drafting will result in a “race to the bottom”, as we agree that Ofgem have retained a sufficient ability to apply enforcement when required.

All of Ofgem’s minimum requirements for the Code of Practice are very sensible and will streamline processes and reduce resource requirements significantly. The requirements for accreditation, design approval and acceptance of non-contestable quotes are particularly appreciated by us.

Yours faithfully,

Graz Macdonald
Head of Regulatory and Policy Analysis
Green Frog Power Ltd