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Haven Power Limited
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16th December 2015

Sent via email to: donald.smith@ofgem.gov.uk

Dear Donald,

Consultation on proposal to modify Standard Licence Condition C13 of the electricity Transmission Licence (adjustment to use of system charges (small generators))

I am writing in response to the above consultation.

Haven Power is a Drax Group company and is a non-domestic electricity supplier that has been supplying Small Medium Enterprises (SME), including microbusinesses since 2007. In 2009, we entered the Industrial & Commercial (I&C) sector and have been steadily growing our customer base in both areas and currently supply ~29,000 and ~9,600 MPANS in the SME and I&C sectors respectively.

In April 2013, National Grid began an informal review of the charging arrangements for embedded generators in advance of the 31 March 2016 expiry date of Standard Licence Condition C13 (SLC C13, commonly known as the Small Generator Discount or SGD). National Grid concluded that, in its view, there was a level playing field between sub-100MW generators connected to the 132kV network in Scotland and the same generators in England and Wales without the 25% discount. It therefore proposed that the SGD should be allowed to expire.

We agree with National Grid's findings and are disappointed that Ofgem are now consulting on whether SLC C13 should be extended to an expiry date of 31 March 2019. Consumers are already facing substantial increases in TNUoS charges from April 2016 and we believe that this additional cost is unfair as National Grid's analysis clearly demonstrated.

Should you have any questions or wish to discuss this response, please feel free to contact me.

Yours sincerely

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