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Catherine Williams
OFGEM
4 Millbank
London
SW1P 0BE

Our Ref: EN01-005253

22 December 2015

Dear Catherine,

Re: RES Response to OFGEM Consultation on Extension of SLC 13 - Small Generator Discount

Renewable Energy Systems Limited (RES) is the UK's largest independent renewable energy developer with interests in onshore wind, wave and tidal, offshore, solar, energy storage and demand-side response. A wholly owned UK company at the forefront of innovation and infrastructure development around the world, RES now employs over 1000 people and has built over 1000MW of wind energy assets in the UK – around 10% of the UK's total installed capacity.

RES welcomes the Ofgem proposal to modify SLC C13 by amending the expiry date of this condition from 31 March 2016 to 31 March 2019 as set out in its open letter consultation "*Consultation on proposal to modify Standard Licence Condition C13 of the electricity transmission licence (Adjustment to use of system charges (small generators))*", dated 25 November 2015 ("the Open Letter Consultation") and supports its timely implementation.

RES agrees that the proposed change is required to avoid undue discrimination against 132kV connected small generators in Scotland pending the completion of full review and consideration of charging arrangements necessary to establish a level playing field between such generators and 132kV embedded generators in England and Wales. RES would add that this review can only realise a balanced and fully considered outcome if it takes into account total system operation and total system charging, including charges for connection to and use of distribution systems, and the effects of dynamic distribution system operation. RES considers that, until this work has reached its full conclusion and has been implemented in relevant regulated codes and charging methodologies, further extension of the expiry of SLC C13 may be necessary.

RES looks forward to making a full contribution to further work by National Grid and other industry stakeholders on this and related issues.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Smart', written over a horizontal line.

Patrick Smart
Head of Energy Networks
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