



Ofgem

Donald Smith

Submitted by e-mail to:

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RWE Innogy UK

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RE: Consultation on proposal to modify Standard Licence Condition C13 of the electricity transmission licence (Adjustment to use of system charges (small generators))

Dear Donald,

RWE Innogy UK welcome Ofgem's proposal to modify SLC C13 by amending the expiry date of this condition from 31 March 2016 to 31 March 2019.

The expiry of SLC C13 in 2016 would have a significant negative impact, in the form of a step change in use of system charges for Scottish projects. Investments have been made on the basis that although the small generator discount was introduced as an interim measure, it would only be removed upon the commencement of an enduring arrangement to level the playing field for such small transmission connected generators. Comparing charges across our own portfolio, we can see that the discrimination identified in the implementation of BETTA persists. Therefore, we support Ofgem's observation that the rationale for a discount still stands.

Providing until March 2019 for the enduring solution to crystallise is appropriate. It should allow sufficient time for emerging work to fully develop and also to factor in a sufficient lead time for connected customers to ready themselves for any new charging changes.

We request that Ofgem's decision on this consultation is announced swiftly so that we can factor this into our charging forecasts as soon as possible.

Kind Regards,

Fruzsina

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