

Ofgem  
9 Millbank  
London SW1P 3GE

Submitted via email, 5<sup>th</sup> January 2016

Dear Donald,

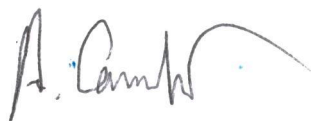
**Consultation on proposal to modify Standard Licence Condition C12 of the electricity transmission licence**

Vattenfall is the Swedish state-owned utility and one of Europe's largest generators of electricity and heat and the second largest player in the global offshore sector. It is our ambition to be at the forefront of the low carbon transition and we are strongly committed to significant growth in wind, onshore and offshore. This commitment and ambition is clearly evidenced by the fact that Vattenfall has invested nearly £3bn in the UK in onshore and offshore wind since 2008 and will have nearly 1GW in operation onshore and offshore by 2017. It is our ambition that the UK will continue to be a growth market for Vattenfall.

Thank you for the opportunity to respond to your consultation on extending the small generator discount in Scotland. We strongly support Ofgem's reasoning that the discount should remain in place until new enduring charging arrangements establish a level playing field for small 132kV connected generators in Scotland. Removing the discount before such arrangements are in place would discriminate against this category of generator and disadvantage such generators that have already invested with the clear understanding that the discount would remain until such enduring arrangements were established.

We look forward to engaging further with Ofgem on this and related matters.

Yours sincerely

  
PP

**Piers Guy**  
**Director – Offshore Development, Vattenfall and UK Country Manager**