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Catherine Williams
Head of Commercial Regulation
Electricity Transmission
Ofgem
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12 January 2016

Dear Catherine,

Proposed changes to the way Statements of the Basis for Transmission Owner Charges are produced and Statutory Consultation on modifying Special Condition 8C: Basis of transmission owner charges

Scottish Hydro Electric Transmission plc (SHE Transmission) welcomes the opportunity to comment on Ofgem's proposed changes consultation to the way SHE Transmission's Statements of the Basis for Transmission Owner Charges are produced.

Proposed improvements

With regards to the additional wording within Special Condition 8C, whilst we don't believe that further clarity is necessarily required, we have no objections to this insertion if it will benefit understanding to a wider audience.

Concurrently, we agree that future changes to the form of the currently approved TO statements should be re-approved by Ofgem in all instances.

For indicative connection charges we agree that these are best produced by the TOs, and appreciate the recognition for the collaborative work undertaken through the Charging User Group (ChUG), which has resulted in an improved charging process. SHE Transmission will continue to be an active participant of the ChUG and the associated Transmission Charging Methodology Forum (TCMF).

SHE Transmission also has no objection to Ofgem's proposal to dispense with your annual draft Statement consultation, and we share the opinion that stakeholder engagement would be more effectively facilitated via the TCMF.

Alignment of requirements

As mentioned previously, SHE Transmission is fully open to continued collaborative working with the other TOs to ensure consistency of approach with regards to charging statements. We are of the opinion that transparent working arrangements of this nature are beneficial to all our customers.

If you wish to discuss further our comments in this letter please don't hesitate to contact me.

Yours sincerely,

Wenche Tobiasson
Networks Regulation