

17 August 2016

James Veaney
Ofgem
9 Millbank
London
SW1P 3GE

By email only to: connections@ofgem.gov.uk

Dear James

Re: Open Letter Consulting on Northern Powergrid's delivery of one of its commitments in 2015-16

Brookfield Utilities UK ("BUUK") welcomes the opportunity to provide further input into Ofgem's assessment of the Northern Powergrid ("NPG") Incentive on Connections Engagement submission. BUUK is the parent company of electricity distribution licensees the Electricity Network Company ("ENC") and Independent Power Networks Limited ("IPNL"). Our licensees operate as Independent Distribution Network Operators ("IDNOs"), owning and operating 'last mile' networks which are principally provided to new developments. These networks connect to the distribution systems of DNOs. Additionally, BUUK is the parent of Power on Connections ("POC") which operates as an ICP undertaking work which may be adopted by BUUK's licensees or other distributors.

Principally we agree with the assertion in your open letter¹ that Northern Powergrid has failed to deliver on one of its commitments in its 2015/16 work plan of activities. They have not delivered the systems required to facilitate effective self-assessment of Points of Connection at High Voltage.

We do, however, not believe that we, as a connections stakeholder, have been adversely impacted by this failure. Where we have a desire to self-determine a Point of Connection to Northern Powergrid's High Voltage network we are currently able to work with Northern Powergrid in order to provide a work around for the systems deficiencies. It is notable that Northern Powergrid have been keen to assist us in self-determining Points of Connection where possible.

Brookfield Utilities would be happy to work with Northern Powergrid in developing the enduring solution for self-determining HV Points of Connection to ensure that it meets the needs of NPG's connection stakeholders.

Yours sincerely

Mike Harding
Head of Regulation

¹https://www.ofgem.gov.uk/system/files/docs/2016/09/incentive_on_connections_engagement_open_letter_consulting_on_northern_powergrids_delivery_of_one_of_its_commitments_in_2015_16.pdf