

Min Zhu  
Associate Partner, Networks  
Ofgem  
9 Millbank  
London  
SW1P 3GE

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By email only to: [connections@ofgem.gov.uk](mailto:connections@ofgem.gov.uk)

Dear Min

**Consultation on the assessment criteria for derogations from the Grid Connection Codes (GCC)**

Thank you for the opportunity to respond to the above consultation. This response is on behalf of UK Power Networks' three licence holding companies, Eastern Power Networks plc, London Power Networks plc and South Eastern Power Networks plc.

Having reviewed your proposal to use the existing GB derogations assessment criteria as the basis for the GCC derogation assessment criteria we believe this is a sensible approach and support your proposal. We have not identified any specific issues however have two observations for your consideration:

- Further detail on the cost-benefit analysis for the economic case is required to enable a more thorough review of how workable the proposed requirements in this area are; and
- We seek clarity that it is correct to consider not just the impact of actual adverse events, but also the risk of the event occurring or a change in the level of that risk.

If you have any queries, please do not hesitate to contact us.

Yours sincerely



James Hope  
Head of Regulation and Regulatory Finance  
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks