

Chris Brown
Head of Core and Emerging Policy,
Energy Systems Integration
Ofgem
9 Millbank
London
SW1P 3GE

Your ref

Our Ref

Date

26th February 2018

Contact / Extension

Paul McGimpsey
0141 614 1951

Dear Chris,

CONSULTATION ON PRINCIPLES TO BE CONSIDERED WHEN RECOVERING THE COSTS OF PROVIDING 'FLEXIBLE CONNECTIONS'

I am writing on behalf of SP Energy Networks (SPEN), representing the distribution licensees of SP Distribution plc and SP Manweb plc. We welcome the opportunity to respond to the Ofgem consultation, of 29th January 2018, on SSEN's proposed modifications to its Statement of Methodology and Charges for Connection.

The ENA response to this consultation reflects the collective views of the majority of its electricity Distribution Network Members (DNOs) and therefore SPEN's 'in principle' position on the questions set out in the consultation.

As you will be aware, SPEN has previously discussed with Ofgem the difficulties of applying current CCCM principles of apportionment to "Centrally Controlled Schemes" which provide benefits to multiple users and which do not have a defined capacity and/or cannot be attributed to a specifically identified base of connecting customers. We believe the ENA response aligns with the views expressed in these earlier discussions.

We would welcome the opportunity to discuss with you the points raised in the consultation and the detail of the Joint DNO ENA response. Please do not hesitate to contact Paul McGimpsey in this regard on telephone number: 0141 614 1951 or email: paul.mcgimpsey@spenergynetworks.co.uk

Yours sincerely,



Gerard Boyd
Commercial and Innovation Manager