



Beaufort Court, Egg Farm Lane, Kings Langley Hertfordshire WD4 8LR, United Kingdom T +44 (0)1923 299 200 F +44 (0)1923 299 299 E info@res-group.com www.res-group.com

Andrew White OFGEM 9 Millbank London SW1P 3GE

Our Ref: EN01-005616

27 November 2017

Dear Andrew,

Re: RES Response to the "Enabling the competitive deployment of storage in a flexible energy system: changes to the electricity distribution licence" consultation.

RES is one of the world's leading independent renewable energy companies working across the globe to develop projects that contribute to our goal of a secure, low carbon and affordable energy future. We develop, construct, finance and operate onshore wind, solar PV, transmission network and energy storage assets. In over three decades of operation, we have developed 10% of the UK's onshore wind capacity and 12GW of wind globally, developed 1.3GW of solar PV globally, built over 1,600km of transmission network outside the UK and become a world leader in energy storage.

RES welcomes the "Enabling the competitive deployment of storage in a flexible energy system: changes to the electricity distribution licence", dated 29 September 2017, ("the Enabling Storage Consultation") and supports the majority of the proposals that it contains. In particular, we;

- Welcome OFGEM's confirmation that DNOs should not generally own or operate storage and agree with the proposed unbundling measures
- Agree with the proposed exceptions to the prohibition to be set out in a guidance document
- Support the form of new standard distribution licence condition 43B proposed in the document.



We look forward to the Statutory Consultation process, including the proposed wording of the Guidance Document.

Yours sincerely,

Patrick Smart

Head of Energy Networks

E Patrick.Smart@res-group.com

T +44 191 3000 452