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Jon Parker, Head of Electricity Network Access  
cc. Jonathan Brearley, Senior Partner for Networks  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

18 September 2018

Dear Jon,

**Northern Powergrid response to Ofgem's 23 July 2018 consultation: 'getting more out of our electricity networks by reforming access and forward-looking charging arrangements'**

Accompanying this letter is Northern Powergrid's response to Ofgem's consultation on reforming network access and charging arrangements.

Our key points are summarised on the front page, and this should give you good sense for the content of our response.

In particular, you'll see that we welcome the review. We also think it needs to be comprehensive – and in fact broader in some areas than Ofgem has proposed. But we also think the existing arrangements are a better starting point than the consultation acknowledges in places.

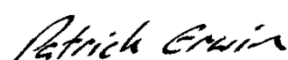
We think all aspects of the review should be Ofgem led, to secure legitimacy of the outcomes. Some of the questions posed in this consultation lead to a debate on which types of activities and classes of network user should be subsidised and by whom. It is important these choices are made openly and transparently and that the distributional implications are carefully considered before extra costs are imposed on particular groups of consumers, including those who have no control over the costs and especially those who are most vulnerable.

We also note that some changes being discussed by Ofgem would require changes to primary legislation – a very real practical issue in the current Parliament.

If there is the opportunity, we would very much appreciate the chance to discuss the detail of our response. A conversation would be especially valuable if there are specific points or pieces of evidence that you would like to explore further.

I am copying this to Jonathan Brearley to stress the links this work has with wider system issues and reform.

Yours sincerely

A handwritten signature in black ink that reads 'Patrick Erwin'.

Patrick Erwin  
Policy and Markets Director

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