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Your ref

Our Ref

Date

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Contact / Extension

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Dear Jon,

**GETTING MORE OUT OF OUR ELECTRICITY NETWORKS BY REFORMING ACCESS AND FORWARD-LOOKING CHARGING ARRANGEMENTS**

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 23<sup>rd</sup> July 2018, on "Getting more out of our electricity networks by reforming access and forward-looking charging arrangements".

I have written separately to Jonathan Brearley to ask that Ofgem acknowledges several fundamental principles to assist in the development of policy in this area. We believe these principles around participant roles, customer behaviour and network investment need to be embedded into the policy development framework around revised access and forward-looking charging arrangements. This will avoid jeopardising safety and security of the network and customers, and risking network operators' ability to fulfill their duty "to develop and maintain an efficient, coordinated and economical system of electricity distribution".

Please find attached the detailed responses to the consultation questions. I would be happy to discuss any of the responses further.

Yours sincerely,



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## **APPENDIX: RESPONSES TO CONSULTATION QUESTIONS**

### **CHAPTER 2: ISSUES WITH EXISTING ARRANGEMENTS**

**Question 1: Do you agree with the case for change as set out in this chapter? Please give reasons for your response, and include evidence to support this where possible.**

We agree with the case for change and welcome the focus of work in this area. Regulatory change is needed to address the challenges faced by electricity networks from the increased volume of decentralised, variable renewable generation. In addition, considerable new stresses on electricity infrastructure will result from increasing demand as a result of the electrification of transport and heat.

These challenges will require to be addressed by a range of initiatives, which will include changes to network access and charging policies. In addition, new markets need to be developed in order to facilitate the services of flexibility providers who will deliver alternatives to traditional reinforcement. Centrally managed active network schemes, similar to the industry leading scheme being developed in Dumfries and Galloway, will also be required to ensure connections are provided as quickly and efficiently as possible as well as providing other network benefits.

We agree it is important to ensure there is a level playing field between transmission and distribution-level projects. We have first-hand experience of large generator projects that have chosen to connect at distribution level rather than transmission purely as a result of forecasted network charges. We note that these inconsistencies can also exist between EHV Distribution Charging Methodology (EDCM) and Common Distribution Charging Methodology (CDCM) connecting customers and it is important that the review addresses these also.

We believe that regulatory change and new market based initiatives will not in themselves be sufficient to address the challenges faced and ensure that the electricity network doesn't become a barrier rather than a facilitator of the roll out of low carbon technologies. Traditional reinforcement still has a key role to play, and may be the most efficient solution to some of the challenges (for example, if Electric Vehicle (EV) smart chargers respond to price signals and switch on simultaneously which then results in a spike in demand which is met by fast response, this could be much more expensive for customers than other solutions). Our own analysis shows that distribution network reinforcements to enable unconstrained connection of domestic 7kW EV chargers would cost customers around £25/annum in Distribution Use of System Charges (DUoS), whilst enabling an average family to save over £1,100/annum in fuel costs. It is also important that the security and safety of the network and customers is at the forefront of the solutions used; if the system gets pushed beyond maximum capacity, then the threat of blackouts will become a reality. Distribution Network Operators (DNOs) should be allowed to transition to Distribution System Operators (DSOs) quickly to ensure that coordinated, regional plans can be developed in time to address and respond to the challenges utilising the most appropriate solutions.

### **CHAPTER 3: OUR PROPOSALS FOR THE SCOPE OF REVIEW OF ACCESS ARRANGEMENTS**

**Question 2: Do you agree with our proposal that access rights should be reviewed, with the aim to improve their definition and choice? Please provide reasons for your response and, where possible, evidence to support your views.**

We agree with Ofgem's proposal that access rights should be reviewed, with the focus on options to reform which can:

1. Clarify access rights and improve choice for small users, including households;
2. Improve the definition and choice of access rights for larger users; and
3. Improve the allocation of access rights.

However, as stated previously, we believe a coordinated range of initiatives is required. We agree that the clarification of access rights for smaller distribution consumers is an essential part of this approach. Access rights are currently unclear for low voltage domestic and small commercial customers. Historically individual supplies have been sized appropriately for the demand of individual customer connections but the network has been sized based on After Diversity Maximum Demand (ADMD) to determine efficient network design. The increased take-up of EVs and heat pumps and other low carbon technologies will change customer requirements and network design assumptions. The establishment of a core level of access for smaller users would assist in the determination of future network requirements, with additional needs requested of the network companies as and when required. Any assessment of core access rights would have to reflect the physical reality of customers' connections arrangements that have been installed over the last 100 years. Many legacy connections are much smaller than the modern equivalent.

The wider industry interest in the development of access products was evident during the time of SPEN's involvement in the Charging Futures Task Forces, where a range of different network users (small and large) indicated that they valued choice across a range of access products, e.g. depth, time of use, level of firmness, etc. We agree with this and would add that, in certain circumstances, it may be desirable to supplement access products (such as time of use) with physical means of preventing certain actions being taken by consumers which are outwith their agreed access agreement (e.g. EV fast charging during peak times unless allowed in their access agreement), thus avoiding the potential for customer interruptions and safety concerns. With this in mind all DNOs supported EATL/SSEN's recent consultation on a tactical solution that would allow DNOs to control the charging of EVs.

Finally, we agree that this work should be supplemented with a review of allocation of access rights. SPEN has consulted with its stakeholders on new queue management rules which are beginning to pay dividends in the release of generation capacity in the SP Distribution network area. We will shortly be rolling out this work across the SP Manweb network and are actively sharing our learning with other network companies within the Open Networks project.

**Question 3: Specifically, do you have views on whether options should be developed in the following areas as part of a review? Please give reasons for your response, and where possible, please provide evidence to support your views:**

- a) **Establishing a clear access limit for small users, with greater choice of options (as considered under b) and c) below) above a core threshold – do you agree with our proposal in paragraphs 3.5-3.10 that this should be considered? Do you have views on how a core threshold could be set?**

We believe the principle of a core level of access is sound and the use of capacity based charging would be more reflective of real network costs. The larger question however is how to establish what that 'core' level is? We consider 'core' is likely to be different in different areas (e.g. urban and rural) and may be different for different customer types. Considerations will include customers who currently possess electric heating, which may be as a result of the lack of other alternatives. The protection of the needs of vulnerable customers' must be established, ensuring the requirement for network access to meet essential needs is not jeopardised. Many small users will not be interested in flexible arrangements where they could be interrupted more frequently to manage network congestion. These users should not be unduly discriminated against in the charges they receive.

As EV rollout increases we will see the use of EVs move beyond the early adopters, who by their nature are more likely to be willing and able to respond to price signals, and more vulnerable customers and fuel poor customers will be impacted. These customers may find that their ability to respond to price signals, is severely constrained compared to others in society. Depending on their circumstances, they may find it a challenge to use the technology to respond to price signals, or may not be able to afford the smart appliances that allow the maximum benefit to be extracted from price signals. It would be an undesirable outcome if revised access and charging arrangements resulted in vulnerable customers subsidising others more able to respond to price signals, and wrong to assume that customers in vulnerable situations will not have an EV and be placing an increased demand on the system.

The uptake of PV installations and their impact on DUoS charges has demonstrated the weakness of using kWh as a proxy for required network capacity. A customer with (photovoltaic) PV, EV and batteries could use 0kWh in a given year but rely upon the network being available as a back-up 24 hours a day/365 days a year for 20kW. A vulnerable customer in comparison could use several thousand kWh/annum but only have a maximum demand of 10kW. From a network design perspective the first customer's needs are double those of the second. This demonstrates that kWh should not be used as a measure of core needs.

Finally we would be happy to work with Ofgem to consider the potential value of trials, within the allotted timescales, to better understand consumers' likely behavioural responses and believe this work could be supplemented by learning shared from experiences elsewhere, e.g. electricity customers' susceptibility to changing their behaviours as a result of cost messages.

**b) Firm/non-firm and time-profiled access – do you agree with our proposal outlined in paragraphs 3.15-3.21 that these options should be developed?**

We agree that the definition and choice of firmness access rights available at transmission and distribution should be reviewed.

Improvements to the definition of non-firm access at distribution

We agree that there is value in establishing further clarity surrounding non-firm rights at distribution but do not agree with the introduction of a cap. The introduction of a cap risks reducing network companies' abilities to offer flexible connections because it introduces an unacceptable level of risk to the management of the network. Our Accelerating Renewable Connections (ARC) project at Dunbar demonstrated that the provision of good information in the current non-capped environment was sufficient for customer projects to be financeable. The Open Networks project is developing a good practice product on information provision by network companies.

We do not believe it would be appropriate for parties to benefit from network unavailability payments in circumstances where they have chosen to connect on a non-firm basis in the absence of there being an appropriate mechanism in place for funding and determining the most economic solution to build. Parallels in this regard can be drawn from current arrangements at transmission.

More broadly network companies should be enabled to make general network reinforcements where cost/benefit analysis demonstrates the value of constrained generation to customers exceeds generation costs.

Improving clarity around the firmness of 'standard' connections at distribution

We agree that the review should provide more clarity around the definition of 'standard' connections at distribution. We believe the alignment of security standards and financially firm access rights at transmission and distribution should be a longer term development.

#### Enhancing the scope for non-firm access at transmission

We believe there are already non-firm access products available at transmission. SP Distribution's experience with Electricity System Operator (ESO)/SP Transmission is that a number of non-firm access products are available where the connection of distributed generation is dependent upon transmission system upgrades. As part of the Statement of Works process, SP Distribution commonly applies for non-firm access on behalf of its customers, minimising the requirement for firm upgrades at Grid Supply Points (GSPs) for which capital charges are applied and passed on to the Distributed Generators (DG) customer(s) seeking to connect.

#### Improving clarity of access to the transmission network for small distributed generation

The current arrangements do not prevent small or medium distributed generation requesting Transmission Export Capacity (TEC) via a Bilateral Embedded Generation Agreement (BEGA) directly with the ESO. However, due to the onerous technical requirements under the BEGA (e.g. Grid Code) few distributed generation sites take up this option. Any review should consider the wider implications of distributed generation agreeing a TEC with the ESO.

#### Time-profiled access rights

We agree that the definition and choice of time-profiled access rights at transmission and distribution should be reviewed. Any such review should consider how the diversity of technologies can be managed to maximise the future capability of the network. SPEN has already had some success in this area in considering the impact of different generation technology types seeking connections in transmission constrained network areas. For example, in many parts of the SP Distribution network area the largest proportion of established generation is wind. We have conducted analysis which has shown that the impact of connecting small (<200kW) PV schemes on the transmission system in such constrained areas is negligible and have as a result been able to remove them from the Statement of Works process and advance connections which would otherwise have been delayed. We believe this principle could be extended to allow greater sharing of network capacity facilitated by time-profiled access.

In any such review a comprehensive analysis to consider the knock-on implications on existing systems and processes and the costs inherent in developing the necessary changes would be required. In time banded periods, increased elements to the tariffs would require to be developed to allow for different capacity at different times. In addition consideration of billing system changes and other IT implications would be required.

#### **c) Duration and depth of access, discussed in paragraph 3.25-3.32 – would these options be feasible and beneficial?**

We agree there is likely to be a market for short-term access products, which may facilitate, for example, connections of flexibility providers of a limited time period in which they would provide services in advance of network reinforcement taking place. We agree that it would be beneficial to prioritise work on this rather than longer-term rights of fixed length for which we see limited benefit or market. In this regard it would be useful to share experience from the ESO in relation to their LDTEC product (limited duration TEC).

We do not favour further work at this stage on the development of local access rights and we share Ofgem's opinion that their development would increase complexity. Should work however be progressed it will be vital to ensure that customers pay the costs associated with back-up network support when/if required.

**d) At transmission or distribution in particular, or are both equally important – as discussed in this chapter?**

We believe there is a greater need to define access rights at distribution. We acknowledge that there is currently greater clarity of understanding amongst transmission connected users as to what access rights they possess.

In any such review it will be vital to ensure that a key outcome will be to introduce consistency of principles where possible across both transmission and distribution.

**Question 4: Do you agree with the key links between access and charging we have identified in table 1? Why or why not? Do you think there are other key links we have not identified? Where possible, please provide evidence to support your views.**

Firmness: Users with less firm access should face lower charges

We agree with the principle that users with less firm rights should generally face lower charges. The cost signal in connection charges is currently clear for new distribution customers trading off flexible and non-flexible connection arrangements. If a move to a shallower connection boundary is preferred we would need to ensure the overall charging framework allows for the sufficient recovery of costs through enduring DUoS.

Any such review will need to consider what is meant by 'shallow' at distribution, i.e. is this analogous to 'shallow' at transmission or is it simply that users would not pay reinforcement costs? The implications of fully unwinding 'shallowish' connection charges could be considerable. We would highlight that SP Transmission went through this exercise at the time of British Electricity Trading and Transmission Agreements (BETTA) for a considerably smaller volume of transmission customers and this was a very time consuming activity and needed to be supported by changes to the price control.

Time-profiled: Charges should reflect the costs of obtaining access at different times

We agree that greater choice around time-profile rights supports a capacity-based charging approach with consideration of options for the development of short-term rights (i.e. within day, a month or seasonal across the year). We also agree that different capacity charges would be appropriate to be applied dependent upon time profiled access and in principle could result in more efficient network use.

However, as stated previously we have significant reservations regarding the extent to which smaller users, particularly domestic, are likely to respond to varying time-profiled access rights and price signals. Further research in this regard would be recommended.

Duration: Shorter-term rights

We agree that we need to review the basis of Use of System charges for users contracting on the basis short-term access rights only.

Duration: Long term access rights and consideration of financial commitment

Our experience of transmission user commitment is that it can be complex to manage, in circumstances where liabilities are passed through to smaller numbers of DG customers benefitting from transmission upgrades. It is our belief that the implementation and management of user commitment for infrastructure works at distribution (where the volumes of customers would be significantly greater and their knowledge/understanding more limited), would be considerably more challenging and time consuming.

Depth/Local: Users with local or shared access rights should face lower forward looking charges

We agree that users' charges should reflect the costs they create on the network. We believe there are opportunities for users to 'share' access, for example DG sites of different technologies

(wind and PV) located in close proximity sharing (and not exceeding) capacity rights. The review would need to consider the means by which such arrangements are monitored and an appropriate basis for charging.

**Question 5: Do you agree with our proposal that targeted areas of allocation of access should be reviewed? Please give specific views on the areas below, together with reasons for your response. Where possible, please provide evidence to support your views:**

**a) Improved queue management as the priority area for improving initial allocation of access, as outlined in paragraphs 3.41-3.44?**

We agree that improved queue management should be the priority for improving allocation of access. As stated previously SPEN has recently concluded a consultation with its stakeholders on queue management rules which are beginning to pay dividends in the release of generation capacity in the SP Distribution network area. We will shortly be rolling out this work across the SP Manweb network and are actively sharing our learning with other network companies within the Open Networks project.

**b) Not to consider the potential role of auctions for initial allocation of access as part of a review at this time, as discussed in paragraph 3.44?**

We agree that the review should not include the use of auctions at this time. This was a clear message delivered by Charging Future Forum members.

**c) To review the areas outlined in paragraphs 3.45-3.48 to support re-allocation of access?**

Establish new access conditions

In an exercise carried out a couple of years ago, SPEN wrote out to customers (in accordance with the Distribution Connection and Use of System Agreement (DCUSA) provisions) in possession of a considerably higher Maximum Import Capacity (MIC)/Maximum Export Capacity (MEC) than they were currently utilising. Whilst some customers were happy to 'hand-back' capacity the larger majority either ignored the correspondence or requested financial compensation for any reduction in their capacity rights. Whilst we would welcome further work in this area to develop use it or lose it rights we consider that primary legislation changes (to the Electricity Act) would be required.

SPEN is committed to supporting the work agreed to be taken forward under Workstream 2 of the Open Networks Project to review capacity management arrangement /opportunities.

Develop mechanisms to allow the trade of access rights

We would welcome further dialogue regarding the advantages/disadvantages of opportunities for the establishment of mechanisms which allow distribution users to trade access rights to reduce curtailment and exchange access rights with other users. The review should consider whether this should be a mandatory requirement or not and take into account the need to ensure appropriate local infrastructure capabilities to allow such trades to take place.

## CHAPTER 4 - OUR PROPOSALS FOR THE SCOPE OF REVIEW OF FORWARD-LOOKING NETWORK CHARGING

**Question 6: Do you agree that a comprehensive review of forward-looking DUoS charging methodologies, as outlined in paragraphs 4.3-4.7, should be undertaken? Please provide reasons for your response and, where possible, evidence to support your position.**

Yes we are supportive of a comprehensive review of forward-looking DUoS charging methodologies being undertaken. The current charging methodologies have been in place since 2010 (CDCM) and 2012 (EDCM), the industry is undergoing fundamental change and these methodologies need to be updated to reflect the changes that are happening i.e. new technologies, more generation etc.

Any changes need to ensure that customers (including vulnerable customers) have the ability to respond to price signals and that these are directly passed through to them (via their supplier or intermediaries if appropriate) and that the complexity of implementation is kept to a minimum.

Pricing signals to influence customer behaviour have a role to play, however it cannot be guaranteed that all customers will change their behaviour to the extent necessary to avoid the need for investment in network infrastructure. In behavioural economic terms, customers have a status quo bias, making it a challenge to get them to move from their current position even if there is a financial gain.

For those customers who will behave in an economically rational manner, including pricing signals within DUoS charges are more likely to influence customer behaviour if they are:

- Significant to the customer
- Passed on straight to the customer (not diluted)
- The customer has the ability to respond

Current methodologies do not support any of the above and therefore to date have not changed customer behaviour. Given the pace of technological change and utilisation of the network it is likely that a combination of pricing signals and technical / system products (e.g. physical restraints) will have the greatest impact.

Considering introducing greater granularity to CDCM Charging (for LV and HV distribution networks) so that charges are more reflective of local network conditions

Care must be taken when considering introducing locational charges to lower voltages. Charges for domestic and small business customers need to be cost reflective and structured so that customers have the ability to respond. Charges also need to be predictable and transparent. Linking charges to the connection of DG could introduce significant volatility and regularly varying pricing signals as DG dominated areas change will not encourage customers to respond.

We agree that it is not correct for all Low Voltage (LV) and High Voltage (HV) DG to receive credits depending upon whether a given area is either demand or generation dominated and that a more cost reflective structure is required. The industry considered this approach with DCUSA Change Proposal DCP137, which was withdrawn as a result of the complexity of implementation outweighing the materiality. We believe it is appropriate for the review to re-consider this however splitting a DNO licence area into demand or generation dominated zones, which could change year on year, will increase volatility and reduce the predictability of charges.

We consider it too complex to have locational signals at domestic level and, subject to concerns previously expressed, believe a tariff structure based upon time of use alone would be more appropriate. However, to avoid/defer reinforcement of the LV network the time of use tariffs will need to match the local demand on the network.



Considering changes to how the locational signals are produced in the EDCM charging (for EHV) to improve predictability

We consider this aspect should be considered for review as there is no evidence that the current locational signals within EDCM encourage customer behaviour. Many customers, especially existing customers, have not been able to respond to the signals and therefore they have been largely ignored. The year on year changes and the site specific nature is also a factor. Moving to a zonal approach may be more predictable and transparent (assuming they will not be site-specific and DNOs are able to publish the charging models).

Considering the balance between usage based charges (including time of use charges) and capacity based charges to provide best cost reflective forward looking charges

We consider this aspect should be considered for review. Capacity based charges will provide for greater predictability and transparency, however if a flat rate capacity charge is applied it does not allow customers to influence their bill. For those customers who will behave in an economically rational manner charging based on a range of capacity bands (i.e. seasonal capacity or peak/non-peak capacity rates) could influence behaviours. The required changes to technical network modelling and IT systems would need to be clearly understood and carefully considered.

We believe applying similar arrangements to smaller users would need to be linked to the core access threshold; however the learnings from P272 would need to be considered.

Charging based upon capacity charges will also ensure those that rely on the distribution network (either consistently or as back up for those times when any behind the meter generation is not in operation) pay towards the up-keep of the network.

**Question 7: Do you agree that the distribution connection charging boundary should be reviewed, but not the transmission connection boundary? Please provide reasons for your response and, where possible, evidence to support your position.**

Yes we agree that the distribution connection charging boundary should be reviewed. We would note however that a shallower connection boundary at distribution may not necessarily result in the same shallow connection boundary that applies at transmission. Instead it may be more appropriate that the connection boundary at distribution simply prevents connection customers having to pay for the costs of reinforcement, retaining the liability for extension networks asset costs.

The connection boundary review needs to ensure that any change doesn't impact on flexible connections. We agree that the current arrangements result in incremental reinforcement rather than taking into account wider considerations of growth. When considering reviewing the distribution connection charging boundary to a shallower one, we believe the following points should be considered:

- Extension assets should continue to be paid in full by the connecting party (review could consider different options for payment, i.e. annualised post connection).
- Agree reinforcement costs may in certain circumstances act as a blocker to connections. However, we should maintain the principle of the £200/kW rule to ensure that high cost projects continue to receive appropriate cost signal (i.e. to connect somewhere else).
- Socialisation of reinforcement costs – review should consider who should pay, i.e. is it the wider DUoS customer base or is it a targeted customer segment, e.g. all generation or only generation connecting in a given area. Another example is who should pay for reinforcement triggered by storage connections.

- We agree with the principle of extending user commitment to distribution, however our experience of transmission user commitment is that it can be complex to manage where liabilities are passed through from the ESO (via the DNO) to DG customers benefitting from transmission system upgrades. We do not believe the current form of user commitment methodology is necessarily appropriate for application to distribution connections and we believe other options should be considered.

**Question 8: Do you agree that the basis of forward-looking TNUoS charging should be reviewed in targeted areas?**

We are supportive that the basis of forward-looking Transmission Network Use of System (TNUoS) charging should be reviewed in the targeted areas specifically mentioned in the consultation, namely for small DG and demand.

**If you have views on whether we should review the following specific areas please also provide these:**

**a) Do you agree that forward-looking TNUoS charges for small distributed generation (DG) should be reviewed, as outlined in paragraphs 4.19-4.23?**

The principles of aligning small DGs' charging with that of larger generators to mitigate the unequal treatment for TNUoS charges and ensure that generators across voltage levels receive consistent forward-looking signals, seems appropriate, however analysis and evidence would need to be produced to ensure the resulting methodology provides equal treatment. Any future charging arrangements would need to ensure that charges were reflective of the costs DG impose on the transmission system.

The Open Networks project conducted analysis of charges applying to different connection types across the distribution and transmission networks. This work highlighted inconsistencies of approach between the transmission and distribution charging methodologies and we believe this work should form the starting point for future review.

[http://www.energynetworks.org/assets/files/electricity/futures/Open\\_Networks/ON-WS4-Charging%20Scenarios-170818.pdf](http://www.energynetworks.org/assets/files/electricity/futures/Open_Networks/ON-WS4-Charging%20Scenarios-170818.pdf)

**b) Do you consider that forward-looking TNUoS charges for demand should be reviewed, as outlined in paragraphs 4.24-4.27?**

**Please provide reasons for your response and, where possible, evidence to support your position.**

Yes we agree that forward-looking TNUoS charges for demand should be reviewed. Currently demand customers are based on their usage during triad periods. As triad periods are becoming increasingly unpredictable it would be beneficial to review other charge based options, capacity based and fixed time of use windows which may bring improved predictability to charges.

**Question 9: Do you agree that a broader review of forward-looking TNUoS charges, or the socialisation of Connect and Manage costs through the BSUoS at this time, should not be prioritised for review? Please provide reasons for your response, and where possible, evidence to support your position.**

Yes we agree that a broader review of forward-looking TNUoS charges, or the socialisation of Connect and Manage costs through Balancing Services Use of System (BSUoS) should not be prioritised for review at this time, given it has been reviewed recently and no evidence has been suggested for reviewing wider elements of TNUoS.

**Question 10: Do you agree that there would be value in further work in assessing options to make BSUoS more cost-reflective, and if so, that an ESO-led industry taskforce would be the best way to take this forward?**

We agree that there would be value in further work being undertaken to provide analysis of whether the different cost elements that BSUoS recovers could be charged for more cost-reflectively. We believe that this work could be taken forward by an ESO led taskforce.

#### CHAPTER 5 – TAKING FORWARD THIS REVIEW

We are fully supportive of the Electricity Network Association (ENA) response to this consultation which reflects the collective views of the electricity network companies.