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Chiara Redaelli
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Ofgem
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Our ref

Your ref

Date

9 October 2018

Dear Chiara

Enabling the competitive deployment of storage in a flexible energy system: changes to the electricity distribution licence

I am writing on behalf of Western Power Distribution (South Wales) plc, Western Power Distribution (South West) plc, Western Power Distribution (East Midlands) plc and Western Power Distribution (West Midlands) plc in response to Ofgem's statutory consultation on licence modifications and associated guidance relating to flexibility.

Having had the opportunity to respond to Ofgem's initial consultation and subsequently engage with Ofgem with regard to the licence drafting we have no representations in relation to the DNO related drafting.

However as a comment on para 31C.12, as RIGs are issued under SLC46 they do not apply to IDNOs. I suggest deleting "in accordance with the Regulatory Instructions & Guidance (RIGs) document issued under standard condition 46 (Regulatory Instructions and Guidance)" and replacing this with "annually" or "at least once in every year". This would also work better for SLC43.11 as SLC46 is intended to cover information relating to the DNO charge restriction conditions or other matters covered in the ED1 determinations and as such there is no obvious place to include this requirement.

The guidance document provides helpful context to the licence condition and recognises some of the practical issues that impact network businesses which are outside of the policy on flexibility that Ofgem is seeking to progress.

Yours sincerely



NATASHA RICHARDSON
Regulatory Compliance Manager

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