



Office of the Chief Executive

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By email only to: alena.fielding@ofgem.gov.uk

28 March 2018

Dear Alena

Notice of statutory consultation on a proposal to modify Standard Condition 12 of all electricity distribution licences

Thank you for the opportunity to comment on the above notice, dated 28 February 2018. This response should be regarded as a consolidated response on behalf of UK Power Networks' affected distribution licence holding companies: Eastern Power Networks plc; London Power Networks plc; and South Eastern Power Networks plc.

Subject to Ofgem clarifying that our following interpretation of a specific scenario is in line with its interpretation and, therefore, compliant with the licence condition, we are comfortable with the proposed amendments.

The scenario in question is where a licensee receives payment for connection offer expenses after the "reasonable timescales" it has specified in its correspondence with the customer (in accordance with this modification to SLC12.7(c)). In such scenarios, we believe that under the Electricity Act and this modification to SLC12, the licensee is exempt from the requirement to issue the offer. Nevertheless if the DNO chooses to issue the offer:

- It would not be bound by the 65 working days specified in paragraph 6 of SLC12; and
- It should record the issuing in the SLC12 table of the RIGs, in the relevant row – namely inside or outside the 65 working days.

The consequence of this is that Ofgem will then not be able to use the SLC12 table of the RIGs to assess SLC12 compliance against the 65 working days requirement.

We also believe it is an appropriate time to consider the applicability of the absolute nature of the 65 working day element of SLC12. We believe that customers are appropriately protected by the Connections GSoP standards/SLC15 and therefore the absolute requirement of the 65 working days in SLC12 is now an inappropriate regulatory burden. My team look forward to exploring this with you in more detail over the coming weeks.

If you have any questions on the above, please do not hesitate to contact Paul Measday in the first instance and we look forward receiving your confirmation on the points we have raised.

Yours sincerely



Basil Scarsella
Chief Executive Officer
UK Power Networks

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