

David McCrone  
OFGEM  
Commonwealth House  
32 Albion Street  
Glasgow  
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13 March 2019

Dear David,

**Informal consultation on proposed modifications to the Electricity Distribution Licence**

We appreciate the opportunity to respond to this informal consultation on the proposed licence changes to ensure that the Competition Act provisions in the licence provide the appropriate consumer protections against the concerns raised in the previous consultation on distribution licence applications from affiliates of existing licensees.

We agree with the new wording of the licence conditions. It is appropriate without being burdensome.

We did, however, notice that the modifications set out for licence condition 42 - 'Independence of the Distribution Business and restricted use of Confidential Information' are not replicated in the almost identical IDNO licence condition 31B. It is our opinion that changes should ensure that IDNOs are not able to pass confidential information to their affiliates and that DNOs and IDNOs compete on a level playing field. This will ensure all licences adequately reflect requirements to meet their Competition Act obligations.

Yours sincerely



Beverley Grubb  
Acting Head of Distribution Regulation