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By email only: flexibility@ofgem.gov.uk

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Dear Chiara

Clarifying the regulatory framework for electricity storage: licensing

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc.

We support the proposed consistency in the regulatory framework through the continued exemption regime for sub 50MW generators. We agree that such generators need to register with suppliers in order to import/export electricity and therefore be registered for final consumption levies although final consumption levies should not be charged where the primary function is to export electricity back to the DNO or Grid.

Please note that in parallel to this response we have submitted a response to Ofgem's consultation on storage as it affects the distribution licence.

I hope that you will find our feedback helpful. If you have any questions, please do not hesitate to contact me.

Yours sincerely



James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

Copy Paul Measday, Regulatory Compliance & Reporting Manager, UK Power Networks