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Sent by email to RIIO-ED1@ofgem.gov.uk

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Dear James

Electricity North West response to Ofgem's proposed modifications to Charge Restriction Condition 3F.25 of the electricity distribution licences held by Wester Power Distribution Plc to and paragraph 7.37 of the ED1 Price Control Financial Handbook (fast-track licensees)

Thank you for the opportunity to respond to proposed modifications to Charge Restriction Condition 3F.25 of the electricity distribution licences held by Wester Power Distribution Plc to and paragraph 7.37 of the ED1 Price Control Financial Handbook (fast-track licensees).

We are supportive of the proposed changes which will ensure that the definition of Specified Street Works Costs (SSWC) in WPD's licences align with the corresponding definition for the other DNOs and that the SSWC provisions in the Fast-track Price Control Financial Handbook are also consistent with those in the Slow-track Price Control Financial Handbook.

Whilst writing we also welcome the clarification set out by Ofgem in its RIIO-ED1 Price Control Reopener Decision; Specified Street Works confirming that DNOs will be able to log up future SSWC and that the materiality threshold will not need to be passed a second time for those Licensees that submitted a request under the May 2019 SSWC reopener and passed the materiality threshold at that time.

At present slow track DNO licences are not clear there is a reopener window at the end of the price control for costs in cases such as lane rental with a zero materiality threshold. We look forward to these licence changes coming forward to give licence and price control handbook effect to Ofgem's reopener decision. We suggest ourselves and other licensees where relevant could collaborate through the ENA and share some thoughts on potential licence changes with Ofgem.

I hope these comments are helpful. Please do not hesitate to contact me if you would like to follow up on any particular aspect of our response.

Yours sincerely

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Paul Auckland
Head of Economic Regulation