

Legal Services

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Dear Mick

STATUTORY CONSULTATION ON PROPOSED CHANGES TO THE SPECIAL CONDITIONS OF THE ELECTRICITY DISTRIBUTION LICENCE

Further to the notice of statutory consultation dated 12 October 2020, Northern Powergrid has no representations to make in respect of the modifications proposed to CRC2B of the electricity distribution licence, which will enable licensees to recover outstanding bad debt resulting from the Network Charge Deferral Scheme in the 2021/2022 Regulatory Year. We would, however, point out that "Years" should be singular in paragraph 2B.45(b) of Part J.

In its letters to Ofgem of 21 August 2020, 4 September 2020 and 25 September 2020, the Energy Networks Association made the point, on behalf of the Distribution Network Operators, that Ofgem should consult on the principles to be applied to the treatment in the RIGs of the "true-up" amount via the Revenue Reporting Pack at the same time as the statutory consultation on the licence modifications.

We were, therefore, disappointed to note that Ofgem chose not to do so and, instead, merely stated in its summary of responses to the August consultation that it would only undertake that consultation "after" this statutory consultation.

We would reiterate that point once again and look to Ofgem to confirm that it will commence that consultation without further delay.

Yours sincerely

John Elliott Head of Regulatory Compliance