

**Legal Services**

Northern Powergrid  
Lloyds Court  
78 Grey Street  
Newcastle upon Tyne  
NE1 6AF

Tel: 0191 223 5103

e-mail: [john.elliott@northernpowergrid.com](mailto:john.elliott@northernpowergrid.com)

Chiara Redaelli  
Ofgem  
10 South Colonnade  
Canary Wharf  
London  
E14 4PU

23 March 2021

Dear Chiara

**PROHIBITION ON GENERATING GUIDANCE CONSULTATION**

Northern Powergrid has no substantive comments to make on the version of the Prohibition on Generating Guidance issued by Ofgem for consultation on 23 February 2021. We do, however, have the following comments on the drafting:

Reference	Proposed change
Paragraph 1.9:	Replace "... the licence changes requires that the licence holder reports..." with "... the licence changes require that the licensee reports..."
Paragraph 5.4.1:	Replace "... expect the company to submit..." with "... expect the licensee to submit..."
Section 7 Section summary:	Replace "... for which the licensed operator has been granted..." with "... for which the licensee has been granted..."
Paragraph 7.4:	Replace "... the willingness of third party to own ..." with "... the willingness of third parties to own ..."
Paragraph 7.4:	Replace "... around 6-4 months prior the five years..." with "... around 4 to 6 months prior to the five years..."
Paragraph 7.5.5 a):	Replace "... how the market has been reviewed in which the asset falls under" with "... how the market, in which the asset falls, has been reviewed"
Paragraph 7.5.5 b) d):	Replace "... justified their rationale for ..." with "... justified its rationale for ..." and replace "... with their business case" with "... with its business case"
Paragraph 7.5.5 c) a):	Replace with "A demonstration, through comprehensive reporting, of how all costs are incurred as efficiently and economically as possible, such that the licensee has done everything it reasonably can to ensure value for money"

**NORTHERN POWERGRID**

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Paragraph 7.5.6 a): Replace "... undertaken by the applicant ..." with "... undertaken by the licensee ..."  
and replace "... applicable to the IDNO or DNO ..." with "... applicable to the licensee ...".

Paragraph 7.9: Replace "... no appeal process set up under this licence" with "... no appeal process under this guidance ...".

Paragraph 7.10: Replace "... transfer of asset ..." with "... the transfer of the asset ...".

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Elliott', with a stylized, cursive script.

John Elliott  
Head of Regulatory Compliance