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By email only to: switchingprogramme@ofgem.gov.uk

16 November 2018

Dear Jon

Notice of statutory consultation on a proposal to modify Standard Condition 20 of all electricity distribution licences

Thank you for the opportunity to comment on the above notice, dated 15 October 2018. 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 have outlined in the appendix to this letter a number of observations and suggestions relating to the drafting in the amendments to the distribution licence.

If you have any questions on the above or the feedback in the appendix, please do not hesitate to contact Paul Measday in the first instance.

Yours sincerely

Basil Scarsella
Chief Executive Officer
UK Power Networks

Copy: Suleman Alli, Director of Safety, Strategy & Support Services
James Hope, Head of Regulation & Regulatory Finance
Paul Measday, Regulatory Returns & Compliance Manager
David Pang, Regulation Analyst

Appendix

Feedback on licence conditions

- Paragraph 20.3 (2) uses the phraseology “as the case may be”. We do not believe that this is clear enough and that it would be better phrased as “the date on which the code takes effect, where this is later than the date in paragraph (1)”.
- The last few words of paragraph 20.10 (namely “significant code review”) should be capitalised.
- Paragraph 20.11 has a circular reference to 20.11, which we believe should be a reference to 20.10.
- A cross reference to the GDPR should be added to paragraph 20.11 as any data provision will need to be compliant with these regulations.
- The definition of Significant Code Review already exists in LC21, LC22 and LC23 – we believe that Ofgem should take this opportunity to review the definition in the three conditions alongside the definition proposed in this statutory consultation to ensure that they are appropriate in each case.
- We believe that in paragraph 20.11 e) i), “programme milestones” would benefit from a definition to ensure all parties understand it in the same way.
- Within the definition of Significant Code Review, a capital N is required in “notice”.