



Energy for
generations

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By email to andrew.self@ofgem.gov.uk

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Statutory consultation on our proposal to modify Standard Licence Condition C13 (Adjustment to use of system charges (small generators)) of the electricity transmission licence

Dear Andrew

ESB supports the intention of the small generator discount to create a level playing field for small generators connected at 132 kV across England & Wales and Scotland. We support the proposed extension, as no solution to the issue of geographical differentiated categorisation and/or charging for these generators has yet been introduced.

The extension is time limited to 31 March 2021. ESB highlights that this time limit needs to be considered in the context of other reforms. We are aware of the work that is ongoing under the Targeted Charging Review and are engaged in this process; the outcomes and timelines for implementation are not yet certain. There is a risk that changes will not be implemented prior to expiry of the extension and there will then be no measures in place to address discriminatory treatment of these generators.

ESB notes that the small generator discount has been extended several times, as the fundamental issues have not been resolved. We suggest that the discount is further reviewed later in the TCR development process, with the goal to ensure that a fit for purpose solution is certain to be in place in time for implementation of reforms.

Yours sincerely

Kirsty Ingham
Commercial & Regulation Manager, UK
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