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| **From:** | <colin.paine@engie.com> |
| **Sent on:** | Friday, November 24, 2023 2:56:04 PM |
| **To:** | Electricity Network Charging <ElectricityNetworkCharging@ofgem.gov.uk> |
| **CC:** | phil.broom@engie.com |
| **Subject:** | Open letter on regulatory arrangements for independent distribution network operators - ENGIE comments |
|  |  |

Good afternoon

Here are our comments on the questions asked in the above:

1. *What do you consider to be the pros/cons of IDNOs connecting EHV customers embedded within distribution networks?*
2. *What do you consider to be the pros/cons of IDNOs connecting directly to the transmission network?*

Our comments are general and applicable to both DNO and TN IDNO connections.  The pros from an EHV consumer perspective are that being connected via IDNOs to DNs or the TN may achieve a speedier connection at a more favourable cost to standard DNO EHV tariffs.  The cons are a lack of transparency (due to the inability to mirror DNO EHV charges) to enable accurate and timely pass-through of charges from a supplier perspective, additional complexity in the set-up of charges in supplier billing systems, and less efficiency in the management of connections than would be the case if these were optimised at DNO level, potentially leading to a less equitable share of costs across consumers in the relevant DNO or at TN level.

We are supportive of further work in this area to address these issues with the desired outcome being improved transparency and efficiency in the management of the relevant costs and an equitable outcome both for consumers wishing to obtain timely and fairly priced connections, and for networks looking to allocate charges fairly and deliver the necessary improvements to the connections regime to assist in delivering net zero.

Regards

Colin

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