

Bridget Morgan
Technical Directorate
Ofgem
9, Millbank

London
SW1P 3GE

Lewis Dale
Regulatory Strategy Manager

Lewis.Dale@ngtuk.com
Direct tel +44 (0)1926 655837
Direct fax +44 (0)1926 656520

www.nationalgrid.com

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Our Reference NG/LAD

Dear Bridget,

Reform of requirement for distribution licensees to seek derogation in respect of compliance issues with standard condition 5 of the distribution licence

We appreciate the opportunity to comment on the above proposal. As is mentioned in the proposal, there is the potential for revised distribution network arrangements resulting from these revised compliance conditions to interact with the design and operation of the transmission system. This is particularly an issue where subtle changes to the design and operation of the distribution network may impact the extent to which planned load transfers can actually be used in practice. However, we agree that the proposed exclusions and safeguards should be sufficient to ensure the joint transmission/distribution planning and operating processes should continue to operate satisfactorily.

Given the absence of a definition of demand group in P2/5, and hence the potential for some ambiguity concerning the exclusion for groups of 60MW or more, we suggest there may be benefit in introducing definitions concerning demand groups and the treatment of nested demand groups.

Yours sincerely,

[By email]

Lewis Dale

Cc: Mr Andy Stevenson
Mr Andrew Hiorns
Mr Ben Marshall