




Registered Office:  
Newington House  
237 Southwark Bridge Road  
London SE1 6NP

Company:  
UK Power Networks  
(Operations) Limited

Registered in England and Wales No: 3870728

  
Department of Energy and Climate Change  
Area 4C  
3 Whitehall Place  
London  
SW1A 2HD

22 November 2010

Dear 

**Consultation on the provision of third party access to licence exempt electricity and gas networks**

Thank you for the opportunity to comment on the above consultation. I am responding on behalf of our four licensed entities and our unregulated business.

Our primary concern regarding the proposals in your consultation are the potential complexities of having a licence exempt network where only a sub set of the customers on it opt to choose a third party supplier.

The electricity industry is not set up to have settlement metering at the boundary between the DNO and licence exempt distributor combined with having further settlement metering at end exit points for only those customers that want access to the competitive supply market. Based on the current industry structures, systems and processes the above could result in double counting of some consumption or export data.

Should this approach be followed it requires significant industry change to a number of parties, systems and processes (supplier, distributor, data collector, data aggregator, meter operator) to firstly relate one type of end settlement metering point to a building or network level settlement metering point and to deduct or adjust data between end customer and network level settlement metering.

If you have any other queries on these, please do not hesitate to contact me in the first instance.

Yours sincerely



Return Address:  
Energy House  
Hazelwick Avenue  
Three Bridges  
Crawley  
BN10 1EX

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