

APPENDIX B - RESPONSE FORM

To: Elizabeth Lawlor
 Email: DCUSA@electralink.co.uk
 Fax: 020 7462 8715

Name: Peter waymont

Organisation: EDF Energy Networks

Role: ~~Supplier~~ / DNO / ~~IDNO~~ / Other — Please Specify:

Email Address: peter.waymont@edfenergy.com

Phone Number: 07875 112757

How do the proposed CPs better facilitate the DCUSA Objectives?

<i>Change Proposal</i>	<i>Better Facilitates (Yes/No)</i>	<i>Which Objective</i>	<i>Reasons/Comments</i>
DCP001	no		While the CP makes an argument that some of the objectives are met, we believe that this change prejudices objective 3 (discharge of license) to such an extent that it outweighs any benefit. Overall we believe this does not <u>better</u> facilitate the objectives.
DCP001a	no		While the CP makes an argument that some of the objectives are met, we believe that this change prejudices objective 3 (discharge of license) to such an extent that it negates any benefit. Overall we believe this does not <u>better</u> facilitate the objectives.
DCP001b	no		While the CP makes an argument that some of the objectives are met, we believe that this change prejudices objective 3 (discharge of license) to a lesser extent such that it neutralises any benefit. Overall we believe this does not <u>better</u> facilitate the objectives.
DCP001c	no		While the CP makes an argument that some of the objectives are met, we believe that this change prejudices objective 3 (discharge of license) to a lesser extent such that it neutralises any benefit. Overall we believe this does not <u>better</u> facilitate the objectives.

Are there any other alternative solutions you would like to be considered by the DCP 001 Working Group?

Reasons and explanations:

If you believe more than one solution better facilitate the DCUSA objectives, indicate an order of priority between each of the alternatives. This will inform the Panel's decision about which alternate(s) to put forward for formal voting in addition to the original CP.

We do not believe that any alternative better achieves the DCUSA objectives. However we can see how some of the alternative proposals might have benefits for the industry as a whole, so long as Distributors are never constrained to only making a fixed number of changes and are never required to use best endeavours. We therefore indicate our order of acceptability below;

Highest Priority: DCP001b

Next Priority if any: DCP001c

Next Priority if any:

Next Priority if any:

Reasons and explanations:

Indicate if you expect to incur any costs to support each alternative, particularly where these are related to internal system changes:

none

Comment on the suitability of the proposed implementation date for each CP and each alternative:

Apart from the original change proposal, where the implementation date will be passed prior to implementation, these should all be achievable.

Reasons and explanations:**Any other comments or views on the Change Proposal and Alternatives:**

The legal drafting accompanying each alternative change proposal is drafted so as to make the Distributor take reasonable steps **to** change prices more than once. The desired outcome is surely that he takes steps not to change them more than once.

An alternative drafting might be to leave clause 19.1 as currently worded and insert "The Company shall use reasonable endeavours not to change prices more than X times per year [such changes being effective from <<dates>>]" before the final sentence.

Please clearly indicate which parts, if any, of your comments are to be treated by the Working Group and Panel as confidential.

none