

Hi Roz,

Sorry for the delay in getting back to you – I have been off over the half term period.

I have had a go at editing the legal text, as requested. I have made a lot of changes and it may be worth initially reviewing the document in “Final” mode in order to get the gist before using “Final: Show Markup” mode. Note that whilst there has been a lot of alterations it has never been the aim to change the intent of the document, merely to improve clarity & understanding of the requirements / obligations. I am happy to receive feedback from the Working Group as to whether I have achieved this. I have tried to include a comment wherever I made a change, but there are certain parts where this became unrealistic.

My main concerns with the legal text are as follows:

1. There is a lot of repeated text which, in my opinion, makes the Schedule confusing to read. Removal of such text would aid clarity & understanding of the requirements / obligations. This could be achieved, for example, by the use of one multi-stage notice rather than multiple notices.
2. SRNs and ESRNs do not appear to require Users to do anything. They seem merely to flag up that the original LMA notice has been ignored, that the capacity headroom is increasingly diminished, and that there may be future consequences in the form of Compliance Notices. Any consequences appear to be restricted only to changes made post issue of the SRN / ESRN rather than post issue of the LMA. Accordingly, it is unclear what the purpose of the SRNs / ESRNs are, and I have endeavoured to remedy this.
3. Compliance Notices are not defined in any way, and I have remedied this.
4. In the case of ESRNs, it is not practicable to dictate a long list of MPANs over the telephone to multiple parties. It is also unclear what the User could do with this information in real time. If the distribution network was in such jeopardy then DNOs would take action in accordance with Distribution Code DOC6 rather than employ Schedule 8. Consequently I have amended ESRNs such that they are issued in accordance with Clause 59?
5. Multiple references to Suppliers rather than Users. I have suggested we stick to Users only.
6. Where Notices to be sent to the User, all other Suppliers and the Authority I have suggested that this should be to all Users and the Authority.

I don't in any way profess that my changes are comprehensive and complete, but hopefully they are sufficient for everyone to understand the intent and consequently to take a view as to whether my suggestions are worth including (either with or without amendment).

Regards,

Graham Brewster

**Comment [RT1]:** Action to feedback to WPD and update consultation response document with feedback (add as Appendix). ACTION

**Comment [RT2]:** The repeated text means that all the requirements for each notification are in a single location rather than being spread over different locations. This makes it easier for those that have received a particular notification to easily refer to the requirements.

**Comment [RT3]:** The differences between the stages are set out in the DCP 204 Change Report and it should be clear in the legal text.

**Comment [RT4]:** Compliance Notice is in the definitions section.

**Comment [RT5]:** The legal text does not require a list of MPANs to be passed over the telephone.

DOC6 action may be taken but Suppliers need to know which MPANs are affected. It would not be unreasonable to notify the Supplier by telephone and then send an email with a list of MPANs.

**Comment [RT6]:** The group has previously discussed this topic and agreed that it is correct to refer to Suppliers, as this encompasses Suppliers that currently do not have any customers in the LMA.

**Comment [RT7]:** See response to point 5.