

### **Respondent No. 3 - Network Licence Granted to Grenada Electricity Services Limited**

As mentioned in previous comments, I consider Grenada to be of a size where such readjustments of the existing electricity provision within the country to be unnecessary. By all means review contracts by introducing the "Green Energy" requirements, bringing this up to 21<sup>st</sup> century and beyond requirements. This however, should be a negotiated or sit around the table discussion formulated into a contractual agreement.

That said, this document appears to be strait forward industrial standard requirements. However, I have the following concerns.

#### Section 3

##### C Term

1. The initial term of the licence being 25 Years.

While this may be industry standard, too an extent. Is this timescale really appropriate, allowing the Licensee sufficient time to raise capital for infrastructural changes and further develop the network to meet current and future demand? And, is this favourable with lending institutions?

C3 - (a) Procedure for renewal of Licence- is this recommendation for renewal solely rest with the Commission? I trust this will include a thorough assessment pf past performance and meeting and even exceeding Key Performance Indicators (KPI's)

#### Section E

##### Sub-section 2 (f)

The granting of non-discriminatory access to and in use of its transmission & Distribution system.

Although written into contract, this is a midfield and should be tightly and fairly regulated. As the PURC no doubt recognise, this is Grenada and obstacles regularly cloud sound and well-meaning statements.

##### Section G (5) – Public Information-

Please ensure that the Licence has on its website the following: -

- Facility to encourage customer feedback on its service provision and
- An active customer complaint logging process

##### Q Termination of licence for expiration of its terms

(1) & (2) Transfer of shares and subsequent action after transfer of shares.

Please clarify – GRENLEC shares held by private individual is to be transferred to the Government without paying for them? Should this be purchased from said individuals by GRENLEC before transferring to the Government?

Likewise, once in the hands of the Government, will these be referred back to individual owners one the issuing of a new licence?