

# ≡ Scottish and Southern Energy plc

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Dear Catherine

## **Distributor Provision of MPAS Services - Consultation Document**

Thank you for the opportunity to comment on the above document issued on 15 April 2003. As we have previously stated we broadly welcome the proposed amendments and have only a few comments in respect of the consultation paper.

We are firstly concerned that in respect of existing licence conditions 36, 36A, 36B and 36C the document is virtually silent. It does not explain what is to become of them. Paragraph 5.9 of the consultation says "At present, all licensed distributors who have a distribution services area are obliged to provide an MPAS to electricity suppliers and distributors within this service area. Under this proposal this obligation will remain". We assume from this that the current MPAS obligations of Conditions 36 - 36C will remain in place. Also we assume the other obligations of Conditions 36 - 36C relating to MAP and MAM will remain as they are in Section C. Could you please confirm that our interpretation is correct and that Conditions 36 - 36C are to remain unchanged?

We would be firmly opposed to any licence modification for existing DNOs which move these conditions into part B of the licence and hence which extend the scope of the existing metering obligations. This would introduce significant additional complexity into the market for no obvious benefit.



Also as you are aware, prior to the introduction of P62 we have set up interim arrangements with NEDL in respect of a development known as Newcastle Great Park. The introduction of the proposed licence modifications prior to the introduction of P62 could seriously undermine these arrangements and we are therefore concerned over the timing of the modifications. Whilst we are, of course, minded to support the proposals we would suggest that they are worded such that they only become effective contemporaneous with the introduction of P62.

As regards the timetable for the introduction of P62, we believe that there should be a slight delay of approximately four months to allow IT system changes to be implemented.

I trust you will find these comments helpful and I look forward to hearing from you with regard to clarification of the situation in respect of Conditions 36 - 36C.

Yours sincerely



**Rob McDonald**  
**Group Regulation Manager**