

Catherine Monaghan  
Ofgem  
9 Millbank  
London  
SW1P 3GE

16<sup>th</sup> May 2003

Tel: 0141 568 3259

Dear Catherine,

**Distribution provision of MPAS Services Consultation Document – April 2003**

ScottishPower Energy Retail Ltd welcomes the opportunity to respond to the above consultation. We believe the proposal provides an opportunity to develop a consistent and robust framework for addressing the provision of MPAS services for existing and potential new licensed distributors.

The lack of licence conditions that permit embedded distributors and potential new licensed distributors, to operate without an MPAS and enquiry service appear inadequate. We believe that these distribution companies should be required to operate an MPAS service and that the best way to facilitate this obligation would be to allow them to sub-contract this service with the incumbent distributor.

We would support a modification to the distribution licence requiring all licensed distributors to provide an MPAS and enquiry service. In addition we would support an amendment that would enable new licensed distributors to become signatories to the Master Registration Agreement (MRA). In meeting the current MRA standard industry protocols requiring new distributors to provide an MPAS service, we would encourage distribution network operators to make use of modern forms of communication such as the Internet to provide this service.

In relation to possible modifications to the MRA, we will respond to MRA changes as they arise and take the appropriate action when required.

Should you wish to discuss anything contained in the document or the content of this response then please contact me at the direct telephone number shown above. Alternatively you can contact me via email at [euau.norris@scottishpower.com](mailto:euau.norris@scottishpower.com).

Yours Sincerely

Euan Norris  
Regulation, Legal & Commercial

