

By email:
Switchingprogramme@ofgem.gov.uk

Your ref

Our Ref

Date

11 January 2021

Contact / Extension

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Dear Switching Programme Team

Switching Programme and Retail Code Consolidation: Proposed Licence modifications

SP Energy Networks (SPEN) represents the distribution licensees of SP Distribution plc and SP Manweb plc. We own and operate the electricity distribution networks in the Central Belt and South of Scotland (SP Distribution) which serves two million customers, and Merseyside and North Wales (SP Manweb) which serves one and a half million customers. We therefore welcome the opportunity to respond to this consultation given the proposed modifications that Ofgem wish to make on the Electricity Distribution Licence.

Please find our response to Ofgem's relevant consultation questions below.

Question 3.1: Do you agree with the proposed standard Licence condition modifications as drafted in Appendix 5 for the Electricity Distribution Licence?

We have identified no issues with the proposed modifications to the Electricity Distribution Licence.

Question 3.3: Do you think the change to the definition of Metering Point to remove direct reference to the codes is suitable, and do you consider there to be any risks or unintended consequences that we should take into account for our decision?

We believe that it is appropriate to remove direct reference to the codes within the definition of the Meter Point, and to remove references to "licensee's registration system" and replace it with "industry agreed registration service" as this aligned with the changes required under the consolidation.

However, in removing the reference to the codes (currently MRA Schedule 8), we believe that appropriate guidance for the required MPAN configuration will be lost. We are of the opinion that the appropriate references to where this will now be available should be retained (whether this is in the BSC or the REC as appropriate).

Furthermore, we are also concerned that naming a 'Metering Point' as a unique 'account' may be misleading and could alternatively be named as a 'reference'.

Also, we believe there may be a disjoint in the text around the definition of the Metering Point. The initial part of the definition appears to reference the MPAN more than the Meter Point (as a "unique account within the industry agreed registration system against which a single Energy Supplier can be Registered") the second part of the definition more accurately references what the meter point is in terms of the intention of the connection to be made to the metering point.



Network Planning & Regulation

Please do not hesitate to contact me if you have any queries relating to our response.

Yours sincerely

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