

Rachel Clark
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Ofgem
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By email only to: switchingprogramme@ofgem.gov.uk

15 January 2021

Dear Rachel

Switching Programme and Retail Code Consolidation: Proposed licence modifications

Thank you for the opportunity to respond to the above consultation. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc; London Power Networks plc; and South Eastern Power Networks plc. We are Great Britain's largest electricity Distribution Network Operator (DNO), dedicated to delivering a safe, secure and sustainable electricity supply to 8.3 million homes and businesses.

We have set out our response to your questions in the appendix to this letter, in particular we draw your attention to our feedback on the definition of Metering Point.

I hope that you will find this information helpful. If I can assist further, please do not hesitate to contact me.

Yours sincerely,



James Hope
Head of Regulation & Regulatory Finance
UK Power Networks

Copy: Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks

Appendix

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 set out below feedback on the changes proposed to the licence conditions. This feedback and our comfort with the changes we are not commenting on is based on the premise that underlying changes to the REC have been (or are being) made to accommodate/reflect relevant definitions and requirements.

- Central Charge Database – although we have no issues with the proposed amendments, we believe that the definition could be further improved by including clarity on whose responsibility it is to maintain the database.
- Registered Metering Point – this definition (in SLC13C.10) uses the wording of “registration system” however the notes in column G of the Excel file issued as part of the consultation use "registration service" and we seek clarity that the correct one has been included in the actual drafting.
- SLC14, SLC15A and SLC20 – we believe that Ofgem should check the master copy (i.e. published post statutory consultation) of these individual licence conditions to see if the track changes and numbering errors referred to in the consolidated licence are contained there and it is not just an issue with the consolidated licence (which would therefore not need to be consulted on to align it with the master copy).

In addition to the points listed above we draw your attention to our answer to Q3.3 below.

Question 3.2: Do you agree with the proposed standard licence condition modifications as drafted in Appendix 6 (a-d) for the Gas Transporter Licence?

N/A as we are not a gas transporter.

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 have two concerns related to the proposed definition.

Firstly the use of the term “account” risks causing confusion as this term is used differently across the industry e.g. a domestic customer account may consist of two import Metering Points and an export Metering Point. We suggest the term is replaced with “record”.

Our second concern is in respect of what "industry agreed" means, including what forum makes the decision and how are dissenting views taken into account. There is a risk that without clarity, ambiguity and different views as to what is the current “industry agreed” position could materialise.