

By email:
switching.programme@ofgem.gov.
uk

Your ref

Our Ref

Date

18th March 2022

Contact / Extension

Elaine Carr
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Dear Switching Programme Team

Statutory Consultation on licence changes for the Switching SCR: Standard conditions of Gas Shipper, Gas Transporter and Electricity Distribution licences

This response is from SP Energy Networks (SPEN). SPEN owns and operates the electricity distribution networks in the Central Belt and South of Scotland (SP Distribution plc) which serves two million customers, and North Wales, Merseyside, Cheshire and North Shropshire (SP Manweb plc) which serves one and a half million customers.

We welcome the opportunity to respond to this consultation.

We welcome the amendment to the definition of Metering Point Administration Services (MPAS) in Standard Licence Condition (SLC) 1: 'Definitions of standard conditions', as the use of this term in industry codes no longer reflects the type of MPAS services we provide as currently defined in our licence.

However, we would urge Ofgem to make minor changes to ensure full clarity on the services we provide under SLC 18: 'Provision of and charges for Metering Point Administration Services (MPAS)'. These proposed changes were shared and discussed at the Energy Network Association Commercial Operations Group meeting on the 9 March 2022.

By way of clarity, these minor changes are set out below in response to Question 1 under Section 3 of the consultation.

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SP Transmission plc, Registered Office: SP House, 320 St Vincent Street, Glasgow, G2 5AD Registered in Scotland No. 189126 Vat No. GB 659 3720 08
SP Manweb plc, Registered Office: 3 Prenton Way, Prenton, CH43 3ET Registered in England and Wales No. 2366937 Vat No. GB659 3720 08
SP Distribution plc, Registered Office: SP House, 320 St Vincent Street, Glasgow, G2 5AD Registered in Scotland No. 189125 Vat No. GB 659 3720 08

Internal Use

Q3.1: Question 1: Do you agree that the proposed changes to the Electricity Distribution Standard Licence Conditions will ensure the licence reflects the necessary conditions for implementation of the Switching Programme?

Condition 1. Definitions for the standard conditions

**Metering Point
Administration
Services**

means the service of that name that the licensee must operate and maintain in accordance with the requirements of standard condition 18 (Provision of and charges for Metering Point Administration Services) for the purpose of providing Metering Point Administration Services.

For the avoidance of doubt, the provision of the registration services of the # Metering Point Administration Services may be referred to by a name other than Metering Point Administration Services in any industry code, for example the 'Supplier Meter Registration Service' (SRMRS) in the Balancing and Settlement Code, or the 'Electricity Retail Data Service' (ERDS) in the Retail Energy Code and the provision of the enquiry service for Suppliers of the Metering Point Administration Services is referred to the Electricity Enquiry Service under the Retail Energy Code.

Please do not hesitate to contact us should you have any queries relating to the above.

Yours sincerely

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