# ScottishPower

### energy wholesale

Sonia Brown Wholesale Markets Ofgem 9 Millbank London SW1P 3GE Your ref

Our ref

Date

04 January 2007

Contact/Extension 0141 568 4469

Dear Sonia

# Response to Consultation Document 202/06 - Review of Standard Licence Conditions 14 and 15 of the Electricity Generation Licence

Thank you for the opportunity to respond to this Consultation Document. This response is submitted on behalf of the UK energy businesses of ScottishPower, namely ScottishPower Energy Management Ltd, ScottishPower Generation Ltd and ScottishPower Energy retail Ltd.

#### **Question1**

Are there any options not identified and discussed here?

We consider that the three options identified at 1.1 cover all the possible alternative options for Standard Licence Conditions (SLCs) 14 and 15.

#### Question2

Do you agree with our preliminary view that SLCs 14 and 15 should be given effect in all electricity generation licences?

We consider that SLCs 14 and 15 should be given effect in all electricity generation licences. This would remove discrimination by ensuring that all relevant generation licensees had identical powers within their licences. Further, this option would improve administrative efficiency by removing the need for licensees to request the activation of SLCs 14 and 15 from Ofgem. SLCs 14 and 15 do not in themselves confer the power to compulsorily acquire land, merely the authority to seek permission to acquire land or wayleaves in this manner.



I hope you find these comments useful. Should you have any queries on the points raised, please feel free to contact us.

Yours sincerely,

**James Anderson** 

Commercial and Regulation