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Nicola Cocks
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Dear Nicola,

Standard Licence Condition 4F. Standards for the provision of non-contestable connection services (“SLC 4F”) – Formal licence modification

We are writing in response to Ofgem’s formal licence modification notification dated 13th July 2007.

For the avoidance of doubt, whilst we have set out below our concerns with some of the proposals contained within the licence condition and guidance document, SSE is **not** formally objecting to the modification notification.

SSE is generally supportive of the modification and has worked constructively through the ECSG and associated workgroups to develop the standards and accompanying guidance document.

We welcome the clarity provided that SLC4F will only apply where an applicant requests solely non contestable works from the DNO and has therefore elected for contestable works to be dealt with by a third party connections provider.

We set out our specific concerns below:

SLC4F:

- We welcome the exclusion of 132kV schemes from the proposals for quotation times. However we believe that a review of the turnaround times for 33kV quotations is required. This is because the cost of carrying out these works is typically high and reduced turnaround timescales may result in DNO's having to make assumptions in their quotation. This could result in higher charges or significant caveats in the offer which are not in the best interests of the customers as a whole. *We therefore suggest that schemes down to 33kV should remain at the 90 days turnaround time (for design and quotation). As noted above we are not objecting to the licence condition as it stands but at the very least we believe that Ofgem should keep this aspect under review going forward.*
- In the Schedule, as set out at para 7 (b), we believe that it should be acceptable for an applicant to **agree to** a lower standard, rather than to ask for a lower standard before the licensee can discharge its duties to comply with its obligations under paragraph 6.

SLC4F: Guidance Document – Version 1

- Section 3 Conditions Precedent: The document as currently drafted does not recognise that the DNO may require plant or materials that are necessary to make the final connection, such as a new circuit breaker for fitting onto the existing primary substation. There is clearly a lead time associated with the procurement of these. *We believe that it is essential that this is recognised within the Conditions Precedent since there may be occasions when work cannot be carried out in line with the timescales set out in the licence where there are delays in procuring plant or materials from suppliers.*

Should you require any clarification or further information, please don't hesitate to contact me.

Yours sincerely,

Rob McDonald

Director of Regulation