

Inveralmond House
200 Dunkeld Road
Perth
PH1 3AQ

John Scott, Technical Director
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Telephone: 01738 456571
Facsimile: 01738 456415

21st September 2007

Dear John,

Electricity Distribution Network Planning – ER P2/6

Thank you for the opportunity to comment on whether or not changes are required to standard licence condition (SLC) 5 or Engineering Recommendation (ER) P2/6.

SSE believes that the current licence drafting is fit for purpose. In particular we believe the SLC5 should continue to make reference to ER P2/6 and that the latter should continue to cover all load groups. We are strongly of the view that ER P2/6 should remain the base document for electricity distribution planning. As such, we are not in favour of using the licence condition to refer to more specific obligations rather than to ER P2/6.

Nevertheless, we do believe that ER P2/6 could usefully be updated to remove some perceived ambiguities and improve clarity. As ER P2/6 comes under the governance of the Distribution Code Review Panel (DCRP), we are of the view that it is this industry forum that should review and recommend changes to the guide.

In the longer term we believe that the DCRP could consider a wider ranging review, taking on board the issues raised in the Ofgem open letter along with others such as higher customer expectations of security of supply and a comparison with the GB Security and Quality of Supply Standard applicable to transmission networks. We agree that such work is unlikely to be progressed in time for the forthcoming price control review. It will be for consideration during the price control review whether some mechanism should be designed to recover any additional costs that may come about because of later changes to ER P2/6.

If you have any queries on the above, please do not hesitate to contact me.

Yours sincerely,

Malcolm Burns
Regulation Manager