



SP Transmission & Distribution

Ms E Kelso
Head of GB Markets
Ofgem
9 Millbank
London SW1P 3GE

Your ref

Our ref

Date
9 May 2008

Contact/Extension
Jeremy Blackford

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Dear Emma

New Metering Technology in Public Lighting (April 2008)

I am writing in response to your open letter dated 1 April 2008.

In principle, we welcome the introduction of technology that will improve the accuracy of measuring public lighting energy consumption. We note, for example, the mention of an Elexon estimate of 10% underestimation of consumption for some types of lamp column under current arrangements. Also, we are supportive of an approach to CMS technology that avoids, where possible, requirements (such as a visual display unit) that would otherwise make its adoption impracticable.

Our comments on the specific questions asked in the letter are as follows.

Are there any consequences of proceeding with developing a new standard for CMS technology that we have not considered above?

The introduction of CMS technology, with or without metering functionality, does not remove the need for robust and auditable arrangements for collection and aggregation of data, including the maintenance of accurate inventories of lighting columns. This is particularly so where there are both CMS and non-CMS systems in the same LA area.

Are there any potential impacts of facilitating CMS technology for public lighting which might adversely affect the market? This might include new barriers to entry or any negative impact on market participants or customers.

We are not aware of significant adverse potential impacts from the introduction of CMS technology at present.

Members of the ScottishPower group

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I hope that this is helpful, but please contact me if you would like to discuss.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J Blackford', written in a cursive style.

Jeremy Blackford
Regulation
SP Energy Networks