

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

Regulation Department
Inveralmond House
200 Dunkeld Road
Perth PH1 3AQ

Tel: 07767 850357
Email: ian.bruce@scottish-southern.co.uk

8th May 2008

Dear Emma,

RE: New metering technology in public lighting

SSE welcome the opportunity to comment on Ofgem's letter dated 1st April 2008, inviting views on the intention to facilitate deployment of Central Management Systems (CMS) by developing a standard to allow its approval for use as a meter in public lighting systems.

SSE has been closely involved in the development of this new technology through work carried out by our street lighting subsidiary, Southern Electric Contracting, in conjunction with a number of local authorities as well as equipment designers and manufacturers. We have therefore first hand experience of the operational, commercial and environmental benefits from using Central Management Systems in the control and operation of public lighting systems. We believe that extending the use of CMS to include metering functionality is a natural progression from the current arrangements and support Ofgem's proposal to explore the changes required to allow use of CMS to measure energy consumption in public lighting systems.

We believe CMS measurement technology may also have potential for use in other areas of electricity supply which are currently unmetered, for example cable television and radio amplifiers. It would seem sensible at this time to consider whether the 'perceived legal barriers' to the use of CMS as a meter in public lighting systems also apply in a similar way to these other forms of unmetered supply. The impact of extending the use of the enhanced metering capability of CMS to measure electricity consumption in other forms of unmetered supplies should be explored as part of this exercise in order to understand the full potential of this new technology.

The introduction of new technology often results in unforeseen challenges. Our experience of using some of the current versions of CMS for remote switching of public lighting systems has provided us with the confidence that the hardware is simple to use, reliable and cost effective. As previously mentioned, extending the capability of CMS for use as a meter is the natural next step and will allow the industry to take full advantage of the technology. We fully support Ofgem's views on developing a new standard of CMS technology and welcome the opportunity to be involved in this initiative.

If you have any questions, please do not hesitate to call me.

Yours sincerely

A handwritten signature in black ink that reads "Ian Bruce". The signature is written in a cursive style with a large, stylized 'I' and 'B'.

Ian Bruce

Regulation Manager