

Gareth Evans
Ofgem
9 Millbank
London
SW1P 3GE

Your ref

Our Ref

Date 20 July 2010

Contact / Extension

Jeremy Blackford
0151 609 2346

Dear Gareth

Long Term Development Statement for Electricity Distribution Networks – Consultation on the Form of Statement

I am writing on behalf of SP Energy Networks (SPEN) in response to the open letter issued on 8 June 2010. We welcome the opportunity to comment on the issues raised.

We are happy to consider views from users and other interested parties on the scope for improvement in the current LTDS FoS. However, any changes should not result in an unfair advantage for some users or interested parties at the expense of others. Also, a robust needs case should apply for significant modifications or additional data requirements to ensure that the costs and resources required in implementing changes are taken into account alongside the benefits to users. We welcome the recognition of this point in the letter.

We currently provide a copy of the main sections of the LTDS on the ScottishPower website. The full version (including appendices) is available on request (in hard copy or disc format), and this arrangement enables us to log such requests so as to have some information about the use made of the full statement.

Taking in order the specific proposals on the second page of the letter our comments on these are as follows.

1. Availability of LTDS network data on a common format.

As part of the LTDS appendix D, we provide a list of circuit parameters, transformer data, load information and fault level information. This data can be supplied in Excel or CSV format which can be imported to a modeling package. We thus give users a choice of format for importing to

New Alderston House, Dove Wynd, Strathclyde Business Park, Bellshill, ML4 3FF

Telephone: 01698 413000, Fax: 01698 413053

www.scottishpower.com

their chosen modeling package, and it is not clear what advantage would be gained by restricting this choice. An Excel or CSV format also serves as an open and transparent data format.

2. Full version of LTDS to be downloadable without charge

The full version of our LTDS, whether in hard copy or disc format, is available on request. This enables us to have a record of requests for the full information in our statements, so helping us to monitor demand for this information, to have some visibility of potential new users, and also may assist in the event of security concerns at major sites.

A secure website or subscriber registration, while feasible, would come at a cost to the DNO, both in terms of set-up and maintenance. We do not see a strong case for such an arrangement given the relatively low level of demand for the full LTDS statement at the present time.

3. Schedule of connected generators

SPEN provides a list of connected generators as part of the LTDS. This provides name, GSP, Capacity, plant type and connection voltage. This is considered to be adequate as individual connection arrangements are subject to commercial confidentiality between SPEN and the Generator.

4. Increased updating frequency

We consider that a full update of the LTDS on a frequency of more than once per year is unnecessary. A part update of sections may be considered, but unless significant changes within the network parameters have occurred, additional updates between the annual publication would clearly be superfluous. Currently the changes since the last issue and anticipated future changes are published in the annual statement. The benefit of updating the Statement as and when system modifications occur throughout the year, together with any subsequent system analysis, remains unclear. We are happy to deal with individual queries about particular parts of our distribution network in between annual statements as these arise.

I hope that this is helpful but please let me know if you have any queries.

Yours sincerely,



Jeremy Blackford
Regulation and Commercial
SP Energy Networks