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Dear Gareth,

**Long term development statements for electricity distribution networks –
consultation on the form of statement**

SSE welcomes the opportunity to input into the review of the Long Term Development Statement (LTDS). We want to ensure that our LTDS remains relevant and best provides the technical information that customers need when connecting to or using our network. Given that our comments are relatively general in nature, we did not feel that the tabulated form set out in your letter was appropriate on this occasion. Hopefully this does not detract from the clarity of our response.

In terms of providing a LTDS that best meets the needs of our customers, we do not believe that the current LTDS necessarily needs to be more detailed. Indeed, some users might already argue that the current LTDSs are unwieldy; too much information can be as unhelpful as too little. This is not a reflection of the licence. We believe that the requirements set out in paragraph 25.3 of Standard Condition 25 of the Electricity Distribution Licence are appropriate. However, in reviewing the LTDSs, we believe the focus needs to be on ensuring that the information contained under these licence headings is presented in a clear and structured format and written entirely with the user in mind. We believe more can be done in this area and are already taking steps to make our LTDS more user friendly.

Consistent with this, we believe there is merit in looking to create a common format / structure for future LTDSs across the DNOs. In particular, this will help customers that have a nationwide presence. Importantly, we do not believe that commonality should be about the level of detail, but rather about achieving a consistent layout across the DNOs. For example, we believe it would help if users that are familiar with one DNO's LTDS were able to easily identify where to look in another DNO's LTDS for its equivalent approach or plans. Whilst this is too late to be taken account of in this year's review, we believe this could be developed in time to be reflected in the DNOs' 2011 review.

In terms of making the LTDS available, we do not believe that it is appropriate to have this widely available on our website because of potential security issues. Instead, following Ofgem approval, users or potential users of our network have been asked to request a copy and given the means to do this. We do not believe this discourages or withholds information from genuine interested users, but rather presents a responsible approach. We therefore do not believe that DNOs should be required to freely publish their LTDSs on their websites.

Similarly, we do not believe that there should be a requirement to include a schedule of generators connected to our network. It is not clear what value an untargeted schedule would be to users and, as is rightly pointed out in your letter dated 8 June, this would raise confidentiality issues. Our LTDS already includes a limited listing of connected generation where we believe this is of use to users. We would want to understand why and in what circumstances Ofgem believes that a complete schedule would be of benefit, but we certainly do not believe it should be part of the LTDS.

Finally, whilst we recognise the desire to provide customers with the most up to date information, a statement such as the LTDS will always be a snap-shot in time given the ever-changing nature of the networks. This should be made clear in the LTDS itself and customers should be encouraged to get in contact where the latest information is paramount. We believe the licence requirement to update on an annual basis is therefore sufficient. Any proposal to increase the frequency would need to be reflected in the level of detail that is provided, i.e. it would be a significant resourcing issue if the statement, as it currently stands, had to be updated more than once a year.

To conclude, whilst we believe steps could and should be taken to improve the information that is presented to ensure that it is more tailored to those that use these statements, i.e. clear and targeted information in a consistent and recognisable structure across the different licensed areas, we believe it is important not to confuse this with a need for more information. The key should be about identifying the right information and the right structure and ensuring that this is provided in a way that is understandable to the intended audience.

We hope this is useful input. Should you wish to discuss any of the above in more detail, please do not hesitate to contact me.

Yours sincerely,

Malcolm J. Burns
Regulation Manager