

Roberta Fernie
Ofgem
9 Millbank
London
SW1P 3GE

Your ref

Our Ref

Date

23 January 2012

Contact / Extension

Jim McOmish
0141 614 1953

Dear Roberta,

Project Transmit – timely connections reporting – statutory consultation – response by SP Transmission (SPT)

I am writing in response to the decision letter and statutory consultation issued on 12 December 2011 with proposed modifications to standard transmission licence conditions C8 and D4A. We are disappointed that the proposed Licence changes have not been refined to deal with the shortcomings SP Transmission identified in our previous consultation response (summary below):

1. The drafting is open to interpretation. For example, the drafting is not clear on whether the 'report' is intended to individually cover each offer made within the previous 6 months or to relate generally to "all offers".
2. There is identical wording in the proposed licence drafting as between the UK NETSO and TOs' licence conditions (C8 and D4A respectively). Also, there is inconsistency between TOCO milestone references and the proposed licence wording.
3. Discussion is needed on what the proposed reports are actually likely to deliver and, to assist this, should typical 'blocks' of time dependencies be considered, e.g. i) consents, ii) tendering, iii) contract placement and iv) build?
4. The UK NETSO is the only party in position to have full visibility of an entire project and is best placed to provide such information.
5. With regards to making information publically available, licensees and Ofgem must be cognisant of their obligations under the Utilities Act not to compromise confidentiality of customers' information. It is likely to be difficult to redact/ anonymise a report without giving enough information to enable identification of specific developers and projects.

SPT are keen to work with Ofgem to develop detailed supporting RIGS to deliver consistent expectations by Ofgem and other licensees. However, we are unaware of any plans Ofgem have in this regard. Please do not hesitate to contact me if you have any queries regarding this response.

Yours sincerely,



Jim McOmish, Policy Manager

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

Telephone: 0141 614 0008

www.scottishpower.com