



James Veaney
Head of Distribution Policy
Ofgem
9 Millbank
London
SW1P 3GE

Inveralmond House
200 Dunkeld Road
Perth PH1 3AQ
email: jen.carter@sse.com

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Dear James,

Re: Consultation on DCUSA change proposal 124: Third Party Network – National Terms of Connection

SSE has a small number of networks operated as licence exempt networks and we are therefore responding to this consultation on behalf of these networks. The exact nature of these networks varies, with some serving a mix of commercial customers and one serving predominantly residential customers.

The proposed amendment to the NTC provides a useful framework where bilateral agreements are not in place. However, there can be merit in using bilateral agreements, particularly where the network has specific requirements. Thus, we would recommend that the option to continue to use these is retained as appropriate.

Our licence exempt networks are subject to a bilateral agreement with the relevant distribution network operator (DNO) and with our connected customers. We therefore do not believe this modification will directly impact on our licence exempt networks. We would be extremely concerned if any change was to be applied retrospectively and therefore affecting existing network relationships.

However, we will continue to review the proposed amendments to the NTC. In the event that this review identifies any significant matters of concern that we believe has impacts for this modification, we will contact you to discuss these.

If you have any further questions in relation to this response, then please feel free to contact us.

Yours sincerely,

Jen Carter
Networks Regulation