

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

21st February 2014

Dear James

National Grid Transmission – Proposed Statement of Works Trial

Thank you for the opportunity to provide a view on behalf SP Energy Networks (SPEN) on National Grid's (NGET) proposed changes to the Statement of Works (SOW) process.

SPEN is fully supportive of the proposed changes to the SOW process having been fully engaged with NGET during its development. SPEN believe the changes will lead to a more efficient, cost reflective process.

We agree, that ahead of any formal CUSC Modification Proposal to amend the SOW process, it is appropriate to trial the changes to ensure the approach delivers the intended benefits to customers.

Our responses to the questions posed in the consultation letter are set out below.

I hope you find these comments useful. Should you wish to discuss any of these points further then please do not hesitate to contact me.

Yours sincerely,

Paul McGimpsey
Distribution Policy Manager

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

Telephone: 01698 413000, Fax: 01698 413053

www.scottishpower.com

Question 1 – Do you understand NGET’s proposal

We fully understand the proposed changes to the SOW process

Question 2 – What is your view on the usefulness of the proposal and its perceived benefits

The current SoW process is a lengthy and costly one for distributed generation customers. For connecting parties in Scotland, it is recognised when there will be an impact on the transmission system and as a result triggering the need for a SOW. In such instances, the initial stage becomes academic when it is known the outcome will, in all instances, trigger the requirement for a stage 2, project progression. We believe that moving directly to the project progression stage where there is a known impact on the transmission system will improve the overall process greatly and demonstrate more value to the customer.

Question 3 – Do you have any concerns with this proposal

We have no concerns with this proposal. We do however believe further improvements to the SoW could be introduced and will continue to work with NGET during the trial period to identify these.

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

Telephone: 01698 413000, Fax: 01698 413053

www.scottishpower.com