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Proposal to modify the electricity supply licence – Standard Licence Conditions (SLCs) by inserting a new condition – SLC 21D

Dear Natasha,

We welcome the opportunity to comment on your proposal to introduce the new SLC 21 D into the electricity supply licence. This is specifically in relation environmental claims made against domestic tariffs where the supply to customers is backed up by renewable powered output into the electricity system. Consequently domestic suppliers will need to meet the relevant requirements of SLC 21D on additionality, transparency and evidence of supply.

We have no comments on the proposal itself and the rationale and intent behind it. We understand what it is trying to achieve and is similar in many respects to the requirements we have fulfilled to date under the Green Energy Supply Certification scheme (GESCS).

However, we would like to comment on the application of the requirements within SLC 21D. Given this is about the making of an Environmental Claim and claims in the course of marketing, billing or other communication – then we believe that should be focused on ‘live’ Core Tariffs rather than tariffs in the round and this could be achieved by tying it into the relevant definition.

Alongside the above we recognise that if there are Dead Tariffs out there that fall into this area and presently make Environmental Claims, then they should follow/adhere to the principles contained within the requirement placed upon relevant Core Tariffs.

Finally we would note that your proposal and the proposed timescales around it will impinge upon the existing arrangements in place under the GESCS, in particular the current audit period ends 31st January 2015. As such we would propose that you liaise with the GESCS and the current arrangements are extended out until 31st March 2015 to tie in with when the new requirements commence.

I hope the above is satisfactory and helpful for the purposes of this exercise. If you require anything more please do not hesitate to contact me.

Yours sincerely,

Alan Hannaway
Regulation



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