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Dear Raymond

**Consultation on a proposed licence modification to set objectives for the Master
Registration Agreement**

SSE welcomes the opportunity to provide its views on the proposed licence modification. We generally support the proposals to increase transparency and bring the MRA more in line with other industry codes. Our only real concern is that the proposed objectives appear to narrow the scope of the MRA in comparison to the existing SLC 23.3 (f). The MRA's scope is wider than the change of supplier process and we recommend this is recognised. We have responded to the specific consultation questions in Appendix I to this letter below.

Yours sincerely,

Jenny Rogers
Regulation Advisory, Networks Advisory

Appendix I

Question 1: Do you agree with the drafting of the proposed objectives in Appendix 1?

Yes, although see our answer to question 3 below which notes one area of concern. Otherwise they do not appear to be contentious and will improve the rationale for implementing changes and modifications.

Question 2: Do you agree with the proposed changes to the decision-making, reporting and appeal provisions?

Yes. The proposed changes clarify the process and are in line with other Industry code changes.

Question 3: Do you agree with the proposed deletions of SLCs 23.3(f) and 23.4, given that these matters will be covered by the new objectives?

The new objectives offer more clarity than the deleted sections. However, we are concerned that the scope of the new objectives 23.3A (a) and (b) is narrower than that of 23.3 (f). The systems and processes covered by the MRA are wider than Change of Supplier. Activities such as ECOES, Prepayment, Operation of MPAS and Green Deal are in the MRA for the purpose of supporting an efficient and economical supply of electricity and the relevant objectives should reflect this.

Question 4: Do you think it is necessary to have a specific objective (SLC 23.3A(f)) covering the MRA interactions with the Green Deal? If so, do you agree with the proposed drafting of SLC 23.3A(f)? If not, how could these interactions be accounted for under the other proposed objectives?

We are not convinced that a specific objective relating to Green Deal is necessary. Green Deal arrangements are documented in the licence, MRA and BSC so could be considered covered under the new objective (d). If this is to be included Industry may need to include other interactions. e.g. interactions with the DCC for smart metering.

Question 5: Do you have any other suggestions for the drafting?

No not at this time.