

James Veaney
Ofgem
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Date
16th January 2015
Contact
0141 614 1581

Dear James,

RIIO-ED1 Stakeholder Engagement and Consumer Vulnerability (SECV) incentive consultation

We welcome the opportunity to comment on the above consultation and hope that our comments below are constructive.

1. Panel make up

If the panel tenure is to be time limited, it is important that this is staggered to ensure that DNO's have a level of consistency across the 8 years of ED1. For example, DNO's may have to reiterate work which they have already carried out and Ofgem has advised is not appropriate. As the submissions are of limited length, it would not be appropriate to include explanations of superseded work each time there was a change of panel members.

2. Sharing of scorecard with DNOs

We believe that it would be beneficial to stakeholders and DNO's for Ofgem to share any documentation which the panel will use to help guide them in determining a score out of 10.

3. Trial Assessment

Our current understanding is that the trial is an opportunity for DNOs to receive feedback which will not have any impacts on our 2016 submission; similar to the process taken for the Incentive on Connections engagement (ICE). We have found the process taken on the ICE to be very helpful; however, we believe that a trial in the instance of the SECV would detract from important ED1 stakeholder and social obligations roll out work.

We suggest that DNO's are provided with the detailed scorecard and no trial is carried out in 2015.

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4. Assessment

It is important that there is consistency with regard to the Assessors. The same Assessor should assess all DNO's to ensure that the same benchmark standards are being assessed. It is also important the Assessor chosen for this work is an independent party who does not currently hold any contracts with any DNO or its affiliates.

5. Impacts of Identical Deadlines for Transmission and Distribution companies

Whilst we have previously raised this issue and appreciate Ofgem's stance, we believe it is pertinent and therefore raise our concern over submission deadlines which are identical between Transmission and Distribution.

Throughout the year we endeavour to engage with stakeholders across our Transmission and Distribution licensees, however, identical deadlines do not permit sufficient time to evidence our efforts which we have worked hard on throughout the year. SPEN now have dedicated stakeholder engagement/ social obligations teams. We believe that stakeholder engagement is a very specific submission and that it is only appropriate that experts in this field who carry out our ongoing engagement are able to demonstrate their efforts in a robust manner.

We believe this submission is sensitive and not akin to other submissions which various individuals or experts can prepare. We only wish for our social obligations and stakeholder engagement experts to be involved in this area in order to deliver the best possible service to our stakeholders.

Please do not hesitate to contact me should any of our points require further clarification.

Yours sincerely,



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Regulation & Commercial

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