



Amy Freund
Ofgem
9 Millbank
LONDON
SW1P 3GE

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Contact / Extn:
Stephanie
Rogan
0141 614 1581

Dear Amy

Consultation on Environment Report Guidance Document

SP Distribution plc, SP Manweb plc. and SP Transmission plc. (“the network companies”) are the “asset-owner companies” holding Scottish Power’s regulated assets and distribution and transmission licences. Scottish Power operates along divisional lines, and together, the activities of these companies fall within the Energy Networks division “SP Energy Networks” (SPEN).

We welcome the opportunity to provide comment on the current Environment Reporting Guidance consultation. Ensuring that DNO activity is transparent to stakeholders is very important to SPEN and therefore we agree that it is important to publish our key environmental outputs in a stakeholder friendly format.

At paragraph 1.13 of the consultation, it states that DNOs will be required to include smart grid information even if not directly linked to the environment. The proposed report is heavily based upon innovation data; therefore, we believe this should be reflected in the Guidance document title.

As much of the innovation elements are open to interpretation as well as new for ED1, it may be useful for Ofgem to perform a check of the approach taken across DNOs in the Reporting pack before publication to ensure consistency and comparability across the industry.

We would be grateful for clarity on who Ofgem believe the audience is for this report as this will allow DNOs to develop their reports appropriately.

As a general remark, due to the various stakeholder reports in the public domain, we believe that it may be appropriate to explore whether going forward it would be viable to create one overarching stakeholder report. This report would include all stakeholder publications split into sections based on stakeholder groups.

Ochil House, 10 Technology Avenue, Hamilton International Technology Park, Blantyre, G72 0HT

Telephone: 0141 614 0008

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We suggest that an Environmental working group is convened to discuss reporting Environmental reporting options going forward. Currently, the process for Regulatory Environmental reporting is spreadsheet reliant. This has resulted in heavy reliance upon manual data management throughout the process. Systems such as credit 360 and other web based database systems would allow the process to be delivered more efficiently once established. This would be a cost saving to the consumer in the longer term.

In the meantime, please do not hesitate to contact us should you have any queries regarding the points in this letter.

Yours sincerely,



Stephanie Rogan
Licence Development Consultant
SP Energy Networks

Ochil House, 10 Technology Avenue, Hamilton International Technology Park, Blantyre, G72 0HT

Telephone: 0141 614 0008

www.scottishpower.com