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Dear Grant,

SECV Guidance Document Formal Consultation

Thank you for the opportunity to provide comment on the Stakeholder Engagement and Consumer Vulnerability (SECV) Guidance Document.

Broadly we are happy with the content of the guidance document and fully support the aims the SECV Incentive is attempting to achieve.

There are, however, a couple of areas that we would like to provide comment on. We have previously indicated concern about the responsibilities of the Expert panel in relation to “[assessing] whether it is appropriate to reward [activities where that driver has come from an Ofgem, DECC or other statutory body incentive or intervention]” as stated in Part 5.2 of the Guidance. In order to mitigate these concerns and to ensure that the licensees can make fully informed decisions on the content of their submissions, we ask that Ofgem is more explicit in its guidance, particularly in terms of which drivers it would exclude from the SECV Incentive submission.

Similarly, we believe there is uncertainty over the interpretation of the wording in part 1.2 of the Guidance which states: “The stakeholder engagement element of the Broad Measure of Customer Service incentivises network companies to perform beyond ‘business as usual’ standards (i.e. beyond the requirements of the licence conditions) and to seek timely input and feedback from stakeholders on relevant issues, business activities and other developments”. We believe it would be helpful if the guidance set out a more detailed definition of what constitutes ‘business as usual’ in order that the licensees have the same understanding as the Panel and that this can better inform our submission content and also our wider stakeholder engagement activities.

If you wish us to provide any further explanation of our points or if you have any other questions please contact us at any time

Yours sincerely

Ross Bibby

Regulation, Networks