

Rupika Madhura
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Ofgem
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26th May 2016

Dear Rupika,

Consultation on Modifications to SSICA15 and new SSICA15A

Thank you for the opportunity to comment on the above consultation.

We only have one substantive comment on the drafting. Under 7(b) the Provider is restricted to CSDP services except where the Authority consents otherwise. Given the nature and type of non-CSDP services currently provided this could require Authority consent for minor data reports to various parties. We think this is a bit too bureaucratic and could be addressed either through reinstating “primarily” before “to provide CDSP services”. Alternatively this could be addressed through introducing a de minimis provision similar to that in the GT licence (SSICA36) to restrict the scale of non-CDSP services that can be carried out without Authority consent but not require such consent for relatively minor activities.

If you wish to discuss any aspect of our response please do not hesitate to contact me.

Yours sincerely,



Stephen Parker
Regulation Director

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