

Louise Deighan
RIIO - Electricity Distribution
Ofgem
3rd Floor
Cornerstone
107 West Regent Street
Glasgow
G2 2BA

Your ref

Our Ref

Date

17th February 2017

Contact / Extension

Stephanie Anderson
0141 614 1581

Dear Louise

Consultation on proposed changes to The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008

SP Energy Networks (SPEN) is the networks business of Scottish Power and holds three electricity network licences. We own and operate the electricity distribution networks in the Central Belt and South of Scotland (SP Distribution) which serves two million customers, and Merseyside and North Wales (SP Manweb) which serves one and a half million customers. We also own and maintain the electricity transmission network in the Central Belt and South of Scotland (SP Transmission), although this is operated by National Grid, in its role as the National Electricity Transmission, System Operator of Great Britain.

Thank you for the opportunity to comment on the above consultation. The proposals are pragmatic and will ensure that no unnecessary costs are incurred which ultimately the consumer will have to pay for.

The Complaints Handling SI currently requires us to inform domestic consumers annually, by writing to them, of the existence of our complaints handling procedures and how to obtain a copy. As we do not necessarily have the right information about consumers, we would find it difficult to comply with this obligation, so we currently meet our obligation via suppliers who pass on the Notice of Rights Statements to their customers. However, the recent changes to the Standards of Performance SIs removed the obligation on suppliers to pass on the Notice of Rights Statements to their customers.

We have never been as close to our stakeholders which makes us more agile as a company, reacting to their feedback more quickly. We are in a unique position as a DNO to serve customers in a defined area. We use our stakeholder network to deliver additional services that support customers and this includes raising awareness of our Complaints Handling procedures and Notice of Rights.

Additionally, we will ensure that our Notice of Rights and Complaints Handling procedures are clearly published on our website. Ofgem's proposal remove the obligation is practical as we would otherwise incur significant costs which would ultimately be paid for by consumers.

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

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**SP ENERGY
NETWORKS**

Network Planning & Regulation

Please do not hesitate to contact me should you have any queries.

Yours sincerely,

Stephanie Anderson
Regulation and Network Planning

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SP Manweb plc, Registered Office: 3 Prenton Way, Prenton, CH43 3ET Registered in England and Wales No. 2366937 Vat No. GB659 3720 08
SP Distribution plc, Registered Office: 1 Atlantic Quay, Glasgow, G2 8SP Registered in Scotland No. 189125 Vat No. GB 659 3720 08