

Sophie Adams  
Market Monitoring  
Consumers and Competition Division  
Ofgem  
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13 July 2017

Dear Sophie,

**Ofgem's proposal to revise the Typical Domestic Consumption Values for gas and electricity, including additional information on the peak and off-peak split for Economy 7 meters, and on the mean consumption for restricted meter customers.**

Thank you for the opportunity to provide comments on Ofgem's proposal to revise the Typical Domestic Consumption Values (TDCVs) for gas and electricity. Overall we are pleased with the proposals; in particular the additional information included on the methodologies used in calculating the data has been helpful.

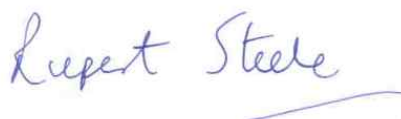
We agree with Ofgem's proposals for revised TDCVs for gas and electricity Profile Classes 1 and 2, and can see no issue with implementation of these revised values from 1 September 2017.

We further support Ofgem's proposal to revise the average Economy 7 peak vs off-peak split to 58%:42%, and again can see no issue with the implementation of this revised split by 1 September 2017.

We also believe it would be appropriate for Ofgem to use the revised Economy 7 split for the purpose of the PPM price control, on the basis that the revised split is based on more up-to-date data than the split originally proposed by the CMA. We believe the change should be made in time for the second charge restriction period starting on 1 October 2017. We understand this would require Ofgem to communicate the new figures in its 7 August Direction.

Should you wish to discuss these points further or if you have any questions, please contact me on the details provided or alternatively contact Gail Devenny on 0141 614 1105 or [gail.devenny@scottishpower.com](mailto:gail.devenny@scottishpower.com).

Yours sincerely,



Rupert Steele  
**Director of Regulation**