

Date

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Contact

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Please find below the SPEN Response to the initial consultation areas, the REC Manager Role, and future MPAS governance. This response is not confidential.

REC Manager's Role

<p>1.3: Do you consider that the methodology as set out above is appropriate?</p>	<p>We believe that the methodology is appropriate as detailed under section 1.17. We do believe that the wording in bullet 8 'proactively and innovatively engaging with stakeholder engagement' could be clearer. This could be changed to 'proactively and innovatively engaging with stakeholders'. It may also be useful to reference the 'critical friend' role at this point (as referenced in section 1.16)</p>
<p>1.4: Do you have any comments on the scope of services?</p>	<p>We have no additional comments at this time</p>
<p>1.5: Do you agree with our outline proposals on the set-up of the REC Manager?</p>	<p>We have concerns regarding the PAB having oversight of the REC Manager functions with no additional details as to the areas that this refers to. While we can see the benefit in certain areas there are other areas that we feel that it would be inappropriate to delegate to PAB (i.e. efficient operation of the Modification process, removing barriers to change and market development, delivering innovation). We believe that there is a requirement for a clear remit (and boundaries) if the PAB is to oversee any REC Manager functions other than 'Performance Assurance and Compliance Monitoring,</p>

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MPAS Governance

<p>Question 4.3: Which option outlined above do you think is best suited to govern MPAS (as defined above) once the MRA has closed, and why?</p>	<p>We believe that DCUSA is best suited to govern MPAS once the MRA has closed, as this is the key code for Distributors in the management of the Network.</p> <p>We believe that Ofgem have highlighted the major areas of concern with the other codes</p> <p>REC - although the DNO's are represented, the majority of the information in MPAS is non - Retail based - which implies that the REC is not best suited for re-homing.</p> <p>BSC- While MPAS data contains Settlement data, and there are Audit processes in place in relation to this, the DNO has no voting rights on the BSC Panel.</p> <p>We do not believe that there is benefit in splitting out governance between the differing codes according to activities; this would add complication to the Industry processes at a time when we are trying to consolidate and simplify the processes.</p>
<p>Question 4.4: Do you have serious concerns about the suitability of any of the options for the future governance of MPAS, outlined above?</p>	<p>We have expressed a view that DCUSA is the most appropriate Code to house the 'MPAS' Governance.</p> <p>We believe that either the REC or the BSC would have differing focus on the information and requirements (i.e. Retail/Settlement information) the DCUSA is DNO-led code, and as such currently covers the MPAN Lifecycle, we see not need to change this, and feel that it is the best fit, although are cognisant that there would be a requirement for changes to ensure cross code engagement, but do not see this as a blocker.</p>

Please feel free to contact me if there is anything in the response that you wish to discuss further

Kind Regards

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