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Dear Anna,

SSE response to paper 4 – disclosure arrangements

We welcome the opportunity to respond to this working paper. It is positive to see Ofgem has considered supplier responses and, as a result, is now allowing suppliers direct access to the SMNCC model. With regards to the disclosure arrangements, we would strongly support the Virtual Disclosure Room (VDR) approach. We support the VDR approach as we believe it will ensure a common infrastructure across suppliers and a standard controlled interface managed by Ofgem. While we do not have any major concerns over the confidentiality ring arrangements, the use of a mobile disk increases the risk of loss of data by external actors and additionally, increases infrastructure costs for each of the suppliers, placing an administrative overhead on each for managing access to data, securing the infrastructure required and returning or destroying the drive.

We would be happy to discuss any questions you may have on the matters we raise in this response.

Yours sincerely

Cher-Rae Fairlie
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