

Marcus Clements
Head of Consumer Protection and Redress
Consumers and Competition
Ofgem
9 Millbank
London
SW1P 3GE

6 June 2016

Dear Marcus,

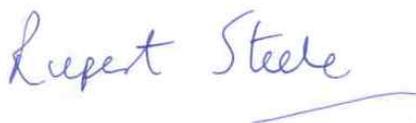
Consultation on proposed changes to the SOR requirements

I am responding to your open letter of 6 May consulting on proposed changes to the Social Obligation Reporting requirements in respect of the smart prepayment market.

We are broadly supportive of the proposals and have set out our responses to your specific questions in annex 1 below.

Should you wish to discuss any of the above points, please contact me, or Gareth Williams on 0141 568 3930.

Yours sincerely,



Rupert Steele
Director of Regulation

**CONSULTATION ON PROPOSED CHANGES TO THE SOR REQUIREMENTS –
SCOTTISHPOWER RESPONSE**

Question 1: *Do you agree with our proposed approach to monitor, through our Social Obligations Reporting, the availability of cash as a top-up method? If not, please:*

- *explain why*
- *suggest and explain any alternative approaches we should consider.*

We are broadly comfortable with the proposed approach to monitor the availability of cash as a top up method for customers with a smart prepayment meter. We would request that Ofgem takes steps to avoid duplicating this reporting requirement in other, specifically smart, reporting obligations.

Question 2: *Do you agree with our proposed data points for inclusion in the SOR (on the number of times a supplier's customer base tops up per top-up channel and the number of smart meter consumers on prepayment), the frequency with which we propose to collect them, and the starting point for collecting them? If not, please:*

- *explain why*
- *suggest and explain any alternative(s).*

We agree with the proposed data points for inclusion in the SOR, and that the frequency and starting points for collection are reasonable. We will take the appropriate steps to develop and integrate alternative top-up methods into our IT systems as they become available to customers, and this will allow the information to feed through to our reporting capabilities.