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Dear Rachel,

Consultation on UK Link and the proposed Central Switching Service

Thank you for the opportunity to comment on Ofgem's consultation on UK Link and the proposed Central Switching Service.

In principle we agree there could be advantages from allowing Xoserve to participate in a competitive procurement process for the new CSS. We recognise that enabling more tenderers to participate would increase competition and ultimately drive cost reductions to customers.

However, we encourage Ofgem to undertake a full impact assessment for both gas and electricity registrations and associated communications infrastructure covering the benefits for the solution architecture, reducing delivery risk and investment and cost to serve. Whilst using UK Link could mean that only half the registration data (for gas) would need to be migrated to a new system, the costs from migrating the other half of the registration (for electricity) should also be understood and quantified.

I hope these comments are helpful. Please do not hesitate to contact me if you want to follow up on any particular point.

Yours sincerely

Simon Brooke
Regulation Manager