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Dear John,

Modification Proposal 0253 – Facilitating a Supply Point Enquiry Service for Large Supply Points

Thank you for providing Scottish and Southern Energy plc (SSE) with the opportunity to comment on the above Modification Proposal.

SSE is not supportive of this modification.

SSE do not believe that releasing the Enquiry data to all shippers will bring benefits to consumers and rather that it could bring some detrimental aspects to the consumer. The reasons for this are outlined below.

Producing a list of Supply Point Enquiry Data will only be accurate at the time the list is produced. Certainly suppliers/shippers may quote from this information but they would be doing so at risk as the data may have changed since the list was produced. Depending on how this is handled by the supplier, this risk may be passed to the consumer or be retained by the supplier. However, in the case of the former it is clear that this would not be beneficial to the consumer.

Our own observations are that prudent consumers at Large Supply Points will obtain quotes for their gas supply in a timely manner either through direct contact or via a tendering process and would not expect an immediate quotation. Consumers have rarely indicated to us that this is an issue and is not a level of service that they are indicating they require. What is of greater importance to the consumer is that the quotation is and remains accurate and is not adjusted after it has been accepted.

Under the UNC enquiries may be made when a shipper is 'contemplating' submitting a supply point nomination. This appears to have been interpreted by the majority of suppliers / shippers as something that may be requested when the consumer contacts a supplier, provides their address leading to their meter point reference number, and requests a quotation. This

modification in effect enables a bulk 'enquiry', which the UNC also currently prevents and would be contrary to the original intent of the wording, evidenced by current behaviours in not making speculative enquiries.

The Enquiry information is all the pertinent information a supplier would need to quote a consumer. It could be used for marketing purposes, for targeting particular customers and for avoiding particular customers. Whilst it could be argued that consumers may become aware of many more options available to them through increased marketing, some consumers may not, and actually see the marketing activity currently experienced reduce. Targeting can be both positive and negative.

Although the modification does not specify how the data will be produced and passed to shippers, there is a concern that the data will reach parties other than shippers and suppliers. Parties such as energy brokers. Once the data is available then confidentiality can no longer be guaranteed. There is no visibility or mechanisms in place within the Industry to ensure that the data is handled appropriately and that the governance in place is adhered to.

Consumers themselves feel that this data about their energy use and behaviours is their data. Whilst the Data Protection Act does not afford them protection in the same way as domestic consumers, we believe that their concerns should be considered. We believe that there are no other examples of business markets where the customers' details are made available to all service providers without the customer having to make contact. SSE believe that that control should continue to be enjoyed by consumers within the gas industry.

Please do not hesitate to give me a call if you wish to discuss this further.

Yours sincerely
Anne Jackson
Retail Gas Business Manager