

Third Energy Package Option Representation

Please provide a response by:

Organisation: Lorna Gibb

Representative: ScottishPower

Date of Representation: 02 March 2011

There is an option to reduce the Objection Window to 3-5 days and the confirmation window to 5 days to achieve a 3 week switch as directed by EU. A further option has also been identified to treat Bank Holidays as working days for SPA processes.

Q1. Do you support any of these proposals?

We support reducing the objection and confirmation windows to 5 days each. We would not support shortening the objections window further as this could lead to an increase in erroneous transfers.

Q2. Please specify your preferred method to achieve the changes proposed i.e. which process or processes should be reduced and by how many days

See above

Q3. Impacts and Costs:

What analysis, development and ongoing costs would you face if this change were implemented?

We cannot provide detail of analysis, development etc yet. It would impact all registrations, losses and reporting on these processes. It would also impact communications with customers as timelines would be amended.

Q4. Implementation:

What lead-time would you require prior to this modification being implemented, and why?

6 months would be best.

Q5. Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

Any implementation has to include all iGTs with the same solution and go live date. It is totally unrealistic to have to manage a phased implementation.

We recognise discussions have taken place on commencing confirmation within the cooling off period. We would prefer not to do this due to the risk of impact on the customer and potentially increasing co-op objections or erroneous transfers.