

## SSE Renewables

“My main points are

- That while trimming the regulator’s budget is good in principle and reflects growing expertise within the business with commensurate reduction in costs for consultants, it is important that high-benefit market developments are fully resourced and implemented. The value to customers of such work must be higher than any short-term saving.
- We believe that 3<sup>rd</sup> package implementation must be a key objective for the coming year. There will be a lot of work involved in delivering an appropriate regulatory framework to implement the new requirements.
- DETI’s draft transposition consultation includes proposals for new types of distribution licences and development of such documents should be prioritised – particularly as new ownership arrangements for T&D interact with transmission unbundling obligations.
- We look for maximum alignment in retail market processes and interfaces between gas and electricity and between NI and ROI. To this end we believe efforts to bring the benefits of competition to gas customers should focus on a thin network model; ie the network operator only provides meter point registration services, with all other market balancing and settlement services being provided by a larger organisation. NIAUR should focus on minimising the investment cost required to deliver automated competition, rather than reducing cost by prescribing manual processes.
- MOSSG should be used as a vehicle to develop industry/CCNI consensus around the FWP deliverables. By leveraging industry expertise, the time spent developing regulatory effort on developing understanding and writing consultation papers can be optimised.

The FWP contains 87 deliverables and delivery of the programme will be challenging.”

Iain Wright