

Consultation on self-supply licences

Southern Water's Response

May 2016



Southern Water's response to the consultation on self-supply licences

We welcome the opportunity to respond to the proposed form of the self-supply licence. Whilst we accept that certain conditions could be excluded or modified from the standard WSSL conditions as they are not relevant to a licensee without end-customers, we do have several suggestions which would provide greater clarity and assurance to wholesalers and licensees.

We would recommend that:

- A definition of Associated Entities is included in section 1 of the licence conditions to ensure it is clear who would be eligible to be served under self-supply.
- It should be made clear in Part B that membership of MOSL and the requirement to make a trading application and pass the market entry assurance is a pre-requisite for obtaining a self-supply licence.
- The wholesaler should have the ability to validate meter reads provided by a self-supply licensee. This is allowed under the Wholesale-Retail Code Business Terms.
- The reference to the 'suspension of undertaker instructions pending Authority determination' in relation to emergency incidents/national security/civil emergencies is removed from Part A sections 5(4) and 6(4) unless a prompt determination can be provided. We suggest a timescale on the length of any such suspension would be appropriate.

Should you have any queries regarding our response, or would like to discuss any aspect of it with us, please contact our Market Reform Manager, Dylan Freeman, on 01903 272351 or by email dylan.freeman@southernwater.co.uk