

Self-Supply Licence Consultation
Retail Market Opening Programme
Ofwat
21 Bloomsbury Street
London, WC1B 3HF.

E-mailed to: retaillicensing@ofwat.gsi.gov.uk

04 May 2016

Dear Sir,

Self-supply licence consultation

Further to the publication of your above consultation document on the 8 April 2016, Yorkshire Water is grateful for this opportunity to provide Ofwat with our comments on the proposed form of self-supply licences.

We have reviewed and are supportive of the approach and the majority of amendments proposed by Ofwat to adapt the "WSSL standard conditions" for application to Self-Supply Licensees.

We do have a small number of comments for your consideration as follows:

1. We note on page 6 of the consultation that Ofwat consider that amongst other matters, disconnection rights within the Wholesale-Retail Code provide "sufficient protection to the wholesaler", however on page 7, there is recognition that "... disconnections managed by retailers, will need some modification". Allied to this, we can see that this position is also reflected in Comment A2 page 17 of the Business Terms in Part 2 of the Wholesale-Retail Code.

We are not aware of any proposed changes to the Codes to remedy this situation, and would be keen to review proposed Code changes that clarify wholesaler rights for non-payment at the earliest opportunity.

2. We note on page 8 of the consultation document, under the summary of the proposed changes from the WSSL standard conditions, you propose to modify condition 6. 'Provision of information to relevant undertakers'.

We believe the provision of information from self-supply licensees to the undertaker in relation to whether occupiers of the premises are likely to be sensitive consumers remains of the utmost importance to the provider of wholesale services to the premises.

Retaining such a condition on a self-supply licensee reinforces any data requirements articulated in the Wholesale Retail Code.

We believe it would be in the best interest of sensitive consumers to retain condition 6. Sections (6)(b), (7), and (9) in the self-supply licence.

3. For added clarity, where clauses have been removed from the WSSL standard conditions to form the Self-supply standard conditions, we would suggest the original numbering sequence is retained but the words "(not used)" inserted.

We trust you find these comments to be helpful and supportive, however should any matter be unclear or require further information, please do not hesitate to contact myself or my colleague Howard Smith: Market_Design_Team@yorkshirewater.co.uk.

Yours faithfully,



P.P.

Wendy Kimpton
Regulatory Strategy Manager