

Response from SSE plc

Question 1: Do you agree with our approach to retail market definition and our proposed retail product market definition?:

Question 2: Do you agree with our approach to wholesale product market definition and our proposed wholesale product market definitions? In particular, do you agree with our proposal to define a Multiple Interface Symmetric Broadband Origination (MISBO) market?:

Question 3: Do you agree with our approach to geographic market definition and our proposed geographic market definitions? In particular do you agree with our proposal to define a larger geographic market in London (the WECLA)?:

Question 4: Do you agree with our approach to product and geographic market definition for wholesale trunk and do you agree with our proposed market definitions for wholesale trunk?:

Question 5: Do you agree with our approach to SMP assessment?:

Question 6: Do you agree with our assessment of SMP for the retail low bandwidth TI market in the UK excluding the Hull area?:

Question 7: Do you agree with our assessment of SMP for the wholesale TISBO markets in the UK excluding the Hull area?:

Question 8: Do you agree with our assessment of SMP for the wholesale AISBO markets in the UK excluding the Hull area?:

Question 9: Do you agree with our assessment of SMP for the wholesale MISBO markets in the UK excluding the Hull area?:

Question 10: Do you agree with our assessment of SMP for the wholesale TI regional trunk market and the wholesale TI national trunk markets?:

Question 11: Do you agree with our assessment of SMP for the retail low bandwidth TI market and the retail low bandwidth AI market in the Hull area?:

Question 12: Do you agree with our assessment of SMP for the wholesale TISBO and AISBO markets in the Hull area?:

Question 13: Do you agree with our approach to remedies and in particular our consideration of the case for imposing passive remedies?:

Question 14: Do you agree with the remedies that we propose for BT in the low bandwidth TI retail market in the UK excluding the Hull area?:

SSE is a large energy company and has contributed to Ofcom's Call for Inputs for this review on the subject of the importance of BT's retail low bandwidth traditional interface (TI) leased lines to the telemetry applications for and protection of electricity networks.

We welcome Ofcom's discussion of this topic in the present consultation and note the references to BT's dialogue with the Energy Networks Association (ENA) on the subject. The regular dialogue with BT established through this route and the commitments they have made to support the relevant services until at least 2018, with three year notice periods of withdrawal for individual services, are clearly welcome. However, it is also useful to have concrete regulatory remedies in place to support both the orderly withdrawal and the interim availability of the currently used circuits on reasonable terms. We therefore agree with Ofcom's formal proposals for BT to continue to supply the relevant circuits, not to discriminate unduly, to publish reference offers and in some cases to be subject to a safeguard cap on retail prices. Migrations of services using these circuits are complex and an important regulatory safeguard is the proposed obligation to provide one year's notice of withdrawal of any of the existing services of this type.

We would welcome Ofcom maintaining its regulatory oversight of this area over the next business connectivity market review period and beyond. Electricity network companies are at different stages in seeking alternative solutions to the use of these circuits and have different challenges in doing so. While discussions will continue BT, it would be helpful to be assured that Ofcom continues to take an interest in seeing a smooth transition to alternative arrangements for critical utility use of these type of communications services.

Question 15: Do you agree with the remedies that we propose for BT in the wholesale TISBO markets in the UK excluding the Hull area and the wholesale TI regional trunk market?:

Question 16: Do you agree with the remedies that we propose for BT in the wholesale AISBO markets in the UK excluding the Hull area?:

Question 17: Do you agree with the remedies that we propose for BT in the wholesale MISBO markets?:

Question 18: Do you agree with the remedies that we propose for KCOM in the retail TI and AI markets? In particular, do you agree with our proposal that KCOM should be required only to publish maximum prices and to be permitted to offer bespoke discounts?:

Question 19: Do you agree with the remedies that we propose for KCOM in the wholesale TISBO and AISBO markets? In particular, do

you agree with our proposal that KCOM should be required only to publish maximum prices and to be permitted to offer bespoke discounts?: