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**RWE npower renewables,
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RWE Response to Ofgem Consultation on extending contestability to jointing to existing DNO mains and associated operational activities

Dear Rebecca,

RWE n-power renewables appreciates the opportunity to respond to this consultation regarding increasing competition in electricity distribution.

As a generation business we have not participated in any trials of contestable live jointing and operational services. However, by principle we welcome measures to move to a more competitive market structure for UK electricity distribution. Prices for services need to be tracked reasonably to costs and we believe that wherever possible, opening up non-contestable elements of charging to competition will help ensure this.

We hope that by allowing new entrants to compete for jointing to DNO mains and relevant operational services, delays will be reduced, the overall quality of jointing and operational services will be driven upwards and as a generation company we will get better value for our money.

Fruzina Kemenes

Regulation & Policy Manager
RWE npower renewables

PTO for response to consultation questions.

1. In considering trials of contestable live jointing and associated operational activities offered and/or run by DNOs:

a. Do you consider that trials have been a success? By what criteria has this been judged?

We have no comment as we have not participated in trials.

b. Are the procedures and policies associated with the extension of contestability accessible and acceptable to competitors? If not, why not? Have you seen any examples of best practice? Do you consider that issues encountered during trials have been adequately addressed/resolved? If not, why not?

We have no comment as we have not participated in trials.

c. Do you consider that DNOs will be able to implement the procedures/terms etc introduced for the trials on a business as usual basis? Please explain the reasons behind your view.

We have no comment as we have not participated in trials.

d. Has there been any interest from competitors to undertake jointing to existing DNO mains and associated operational activity? If not, do you consider that interest would exist if the activities became contestable? ie, would promotion from trial status (including the associated margin arrangements) encourage competition in the provision of this service?

We have no comment.

e. What are the views of respondents that have not had the opportunity/wanted to participate in trials?

We have no comment.

2. Do you consider that competitors should be able to compete with DNOs to undertake live jointing and associated operational activities? If not, why not? If yes, in which segments of the market do you consider that contestability should be extended?

Yes, new entrants (Independent Connections Providers) should be able to compete with DNOs to undertake live jointing and associated operation and maintenance services. We believe it would be of great benefit if contestability were to be extended to all areas of the market.

Jointing to existing mains	Associated operational activities (<i>where applic:</i>
Unmetered ✓	✓
Metered low voltage ✓	✓
Metered high voltage ✓	✓

3. We note that, as yet, not all DNOs have completed trials at all voltage levels. Do you agree that learning from trials in one DNO area at one voltage level can be applied across all DNOs? Do you agree that learning from trials at one voltage level can be applied across other voltage levels? If not, why not?

Transparency and policy consistency is critical. We believe the principles can and should be applicable across all DNO areas at low and high voltage.

4. Do you consider that there are any Distribution Service Areas (geographical DNO areas) where live jointing and associated operational activities should not be made contestable or should these activities be made contestable in principle across all DSAs? Please explain the reasons behind your view.

Jointing and associated services must be made contestable across all DSAs. Having regional differences would be unfair and would deprive certain areas of the benefits of competition. Transparency and policy consistency is critical.

5. If we decide that in-principle contestability should be extended:

a. Do you consider that where an ICP does not hold the accreditation required to joint to existing DNO mains, DNOs should continue to provide this service to the timescales set out in SLC 15 (the existing standards of service associated with the provision of non-contestable final connections services)?

Definitely yes, otherwise this could become a new barrier preventing some smaller ICPs from participating in the market. It is also important that in the absence of accredited ICPs, the regulations governing contestable works continue to be applied to the jointing activities of DNOs. Otherwise there will be no obligation for the incumbent DNO to ensure that works are carried out in a reasonable timeframe.

b. Do you consider that Ofgem should set a deadline by when it expects DNOs to amend their charging methodologies, or should it rely on the Competition Test to incentivise DNOs to extend contestability?

RWE n-power renewables is of the view that Ofgem should set a deadline. In our view a specific deadline would increase competition as soon as possible whilst allowing time for the DNOs to reflect the new arrangements in their charging statements and contractual arrangements.

If the DNOs have common charging methodologies then they should all be working towards having common definitions of what is and what isn't contestable.

c. Do you consider that there is scope to extend contestability further in the future? If so how?

RWE n-power renewables would like to see contestability extended to the EHV charging methodologies.