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**Environmental Services Department**  
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**Engineering**

Connections Policy  
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**Our reference:** E/HS/SL/KTB/MD/19.85  
**Your reference:**  
**Please ask for:** Keith Benson  
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Dear Sirs

**Review of Competition in Gas and Electricity Connections Proposal Document**

I refer to the above document and your invitation to comment/respond to the specific questions you have asked. I am particularly concerned with the contents of Section 5 - Unmetered Connections and the proposed minimum benchmarks for the SLA.

Therefore in answer to question 1 of this chapter I must disagree with your proposals. The percentage target levels are much too low, for example a performance target of 80% for attendance to an emergency is totally unacceptable as I do not consider a 20% failure rate as a reasonable figure.

Also, if the DNO's miss the emergency response target then are the cost for managing the site going to fall entirely on the Local Authority? I would like to see a clause that would allow Local Authority's to recover their reasonable cost from the DNO, for managing the site where DNO's fail to respond within the target time.

In addition, there does not appear to be a maximum target response time stated for any of the categories of work. Does this mean that if the target response time is missed the DNO's response could be indefinite? What is the incentive for the DNO to perform, where they have missed the target?

There is a danger that with so many variables (as shown in table 5.1 Key Performance indicators) it will become very difficult to monitor. In my opinion all areas of the standard should have a minimum level of 90%, with conditions for further improvement.

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I was also interested to read in Section 3 of this document that the proposed minimum performance standards for metered electricity connections (table 3.1) is 90% across the board and the introduction of a licence condition will allow greater scope for action by Ofgem in the event of a licensee failing to meet the standards. Please could you explain why this protocol does not appear to have been used when compiling the proposals for Section 5.

With regards to Competition in Unmetered Connections, question 2, I agree that the scope of works should be based on the contractor's accreditation rather than the 1 metre rule. It is my belief that the 1 metre rule should be abolished. DNO's should permit live jointing directly onto the LV main by competent contractors and they should be allowed to work on all types of cable, not just plastic.

This issue of managing DNO's performance (or lack of) has been on-going for around 10 years. Wigan Council has actively participated in many Ofgem workshops over that period and supported the trial SLA.

I do not think that it is unreasonable for Local Authorities to now expect that Ofgem bring this issue to a speedy conclusion. I would like to see Ofgem produce a robust framework that ensures DNO's offer the same standards of performance for unmetered connections (street lighting), as those around metered connections.

I trust this information is sufficient for you to reconsider the proposals contained in this document.

Yours faithfully

**Keith Benson**  
Street Scene & Lighting Manager