


<p align="center">ENGINEERING BOARD STREET LIGHTING GROUP</p>		
10 th February 2025	<p align="center">RESPONSE TO OFGEM CONSULTATION: CONNECTIONS END-TO-END REVIEW OF THE REGULATORY FRAMEWORK</p>	
Sue Kinsella		

Theme 1 - Visibility and accuracy of connections data and network capacity

<p>Question 1a. Do you agree with the issues we have set out under Theme 1 - Visibility and accuracy of connections data and network capacity? Are there any other issues under this theme that we should consider or be aware of?</p>	<ul style="list-style-type: none"> • We agree with the issues set out under Theme 1. • There are issues with the reliability of information available as cable plans are not always accurate. A real time view of data in a single portal or one stop shop is welcomed. • We would also bring to your attention the need to be able to report errors found on plans or the presence of shallow cables. This should be easy to report and provide confidence that plans will be updated. • A common set of standards is welcomed by those Local Authorities that have more than one DNO to work with.
<p>Question 1b. Do you agree with proposal 1a (new regulatory requirement on single digital view tools)? Do you have any views on how this should be implemented?</p> <p>Question 1c. Do you agree with proposal 1b (new regulatory requirement on the creation of guidance / standards for data visualisation tools)? Do you have any views on how this should be implemented?</p> <p>Question 1d. Do you agree with proposal 1c (new regulatory requirement to provide connections data)? Do you have any views on how this should be implemented?</p>	<ul style="list-style-type: none"> • Questions 1b, 1c and 1d. We agree with the proposals 1a, b, and c set out in the consultation document.
<p>Question 1e. What are your views on the completeness and discoverability of connections data that would be useful to you?</p>	<ul style="list-style-type: none"> • The age and condition of the DNO network is not visible. Frequently we are advised by the DNO that no history

<p><i>Are the existing resources clear and transparent?</i></p>	<p>is kept, and that faults are picked up by Local Authorities. This is how the DNO finds out the condition.</p> <ul style="list-style-type: none"> • The completeness on age and condition of each cable should be known and kept so that this can be proactively managed/replaced by DNO before it gets to a fault condition. • This also helps with future proofing the network for the additional loading from EV chargers on an aged network which may accelerate cable deterioration. • If there are DNOs actively recording age and condition, then that is not readily visible.
<p>Question 1f. <i>Is there additional connections data that would be of use but legal barriers prevent it from being published? If so, do you consider that there are solutions that would enable this data to be made available, for example by aggregating it to appropriate levels / anonymising it etc.</i></p>	<ul style="list-style-type: none"> • No additional comments
<p>Question 1g. Is there anything else regarding Theme 1 – Visibility and accuracy of connections data and network capacity that you consider we have missed?</p>	<ul style="list-style-type: none"> • It would be helpful to have visibility of DNO pole replacement programmes. When poles are replaced, no consideration is given to street lighting equipment that may be attached to the poles. It is frequently the case that the equipment is taken down and scrapped and the Local Authority is not informed. The first time the Local Authority is aware is when the light is reported as missing by residents or reported as a lost communication by a central management system. Costs are incurred for sending contractors out to investigate the fault and the cost of the replacement equipment. • It may be useful for the DNO to work with the Local Authority and use our inventory to compile their own database of assets (poles) that have street lighting equipment attached to them. We can then be consulted/informed of works before pole replacement is carried out.

Theme 2 - Improved standards of service across the customer journey (not including “minor connections”)

Question 2a. *Do you agree with the issues we have set out under Theme 2 - Improved standards of service across the customer journey (not including “minor connections”)? Are there any other issues under this theme that we should consider or be aware of?*

Question 2b. *Do you have any views on proposal 2a (general principles-based licence condition and supporting guidance around standards of service throughout the entire customer journey)? Do you have any views on how this could be implemented?*

Question 2c. *Do you have any views on proposal 2b (new prescriptive condition(s) around standards of service)? Do you have any proposals for any specific areas of the connections customer journey that should be subject to such a requirement?*

Question 2d. *Do you consider that any of the existing standards of service requirements set out in the regulatory framework for provision of specific products / services should be revised or removed? Do you consider that there is any duplication or overlap of regulatory requirements across the regulatory framework that needs to be addressed?*

Question 2e. *Is there anything else regarding Theme 2 – Improved standards of service across the customer journey (not including “minor connections”) that you consider we have missed?*

- Questions are not applicable to ADEPT members - as Local Authorities we predominantly use minor connections.

Theme 3 - Requirement on networks to meet connection dates in connection agreements

<p>Question 3a. Do you agree with the issues we have set out under Theme 3 -Requirement on networks to meet connection dates in connection agreements? Are there any other issues under this theme that we should consider or be aware of?</p>	<ul style="list-style-type: none"> • We agree with the issues set out.
<p>Question 3b. Do you have any views on proposal 3a (strengthened principles-based licence condition around meeting connections dates)? Do you have any views on specific wording that would achieve the intended outcome?</p>	<ul style="list-style-type: none"> • Local Authorities have no influence over the programming of works. There are long delays with programming works therefore a 'maximum date from receipt of order' would assist with managing customer expectations. Currently we are unable to inform customers of target dates as these are not being met and there is no recourse for Local Authorities.
<p>Question 3c. Do you have any views on proposal 3b (minimum standards / SLAs around meeting connections dates)? Do you have any views on specific standards that could be introduced and how they would work in practice?</p>	<ul style="list-style-type: none"> • We agree with the proposals. GSoPs is currently not effective and frequently ignored. Where the standard states 'in agreed timescales' this is meaningless as timescales are not agreed. Timescales are autonomously decided by the DNO and there is no consultation with the Local Authorities.
<p>Question 3d. Do you have any views on proposal 3c (a financial instrument designed to offer recourse to connecting customers who face detriment due to delays)? Do you have any views on how this should be implemented?</p>	<ul style="list-style-type: none"> • We agree with the proposal. We would also like to see reimbursement of costs incurred when connections are cancelled at short notice. It is sometimes the case that contractors working for Local Authorities are required to be on site at the same time as the DNO and if there is short or no notice that work is not going ahead, a compensation event is issued by the contractor which the Local Authority is obliged to pay.
<p>Question 3e. Is there anything else regarding Theme 3 - Requirement on networks to meet connection dates in connection agreements that you consider we have missed?</p>	<ul style="list-style-type: none"> • GSoPs is not being adhered to by DNOs, and penalties are not being paid. There needs to be accountability for delays and financial penalties need to be applied. • Clarity is required as to how these proposals will be applied to IDNOs and ICP contractors, both of whom are

	active in the street lighting connection industry.
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Theme 4 - Quality of connection offers and associated documentation

<p>Question 4a. Do you agree with the issues we have set out under Theme 4 - Quality of connection offers and associated documentation? Are there any other issues under this theme that we should consider or be aware of?</p>	<ul style="list-style-type: none"> • We agree with the issues set out.
<p>Question 4b. Do you have any views on proposal 4a (principles-based licence condition on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific wording that would achieve the intended outcome?</p> <p>Question 4c. Do you have any views on proposal 4b (minimum standards / SLAs on the completeness / quality of the offer and supporting documentation)? Do you have any views on specific standards that could be introduced and how they would work in practice?</p>	<ul style="list-style-type: none"> • We support both proposals.
<p>Question 4d. What do you consider would constitute a 'high quality offer'?</p>	<ul style="list-style-type: none"> • Quotations are generally received in a timely manner; however, costs are excessive and often increase once work has been completed. • Invoices for connection work are sometimes uplifted with additional, unagreed, rates above the already inflated "quotation". Invoices come through sporadically. This can cause issues with third parties as evidence of expenditure is frequently required before payment for work will be made. • Quotations are provided using desk-based investigation. A visit to site is chargeable to Local Authorities which is unreasonable as the DNO should know their network. • A high quality offer should include a site based visit in order that all relevant information is collated prior to the quotation being prepared. This should be at no additional cost to the Local Authority.
<p>Question 4e. Is there anything else regarding Theme 4 - Quality of connection offers and associated documentation that you consider we have missed?</p>	<ul style="list-style-type: none"> • Where quotations do not meet GSoPs, penalties are not being applied. The penalties in GSoPs should be adhered to.

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Theme 5 – Ambition of connection offers

Question 5a. <i>Do you agree with the issues we have set out under Theme 5 - Ambition of connection offers? Are there any other issues under this theme that we should consider or be aware of?</i>	<ul style="list-style-type: none"> • We agree with the issues set out.
Question 5b. <i>Do you have any views on proposal 5a (strengthened principles-based licence condition around offering earliest achievable connection dates)? Do you have any views on specific wording that would achieve the intended outcome?</i>	<ul style="list-style-type: none"> • We welcome the proposal for improved connection dates but would also seek improved communication with Local Authorities regarding connection dates in order that we can manage customer expectation.
Question 5c. <i>Is there anything else regarding Theme 5 - Ambition of connection offers that you consider we have missed?</i>	<ul style="list-style-type: none"> • No further comments.

Theme 6 – Minor connections

Question 6a – Do you agree with the issues we have identified? Are there any other issues under this theme that we should consider? Please provide data and evidence to support your views if possible.	<ul style="list-style-type: none">• We agree with the issues set out.
Question 6b – What are your views on our proposals designed to address these issues? Are there other proposals you consider would achieve the intended outcomes?	<ul style="list-style-type: none">• We believe that proposals could achieve the intended outcome, however, GSoPs has been in place for many years and is not being adhered to by DNOs.• We no longer receive performance reports from DNOs to identify whether GSoPs standards have been met. These should be reinstated.• Any financial penalties applied for erroneous information or non-delivery should be paid to Local Authorities.
Question 6c – Do you have views on how poor performance could be addressed under these proposals to ensure the smallest scale customers are protected and LCT roll out is supported?	<ul style="list-style-type: none">• Monitoring and enforcement needs to be more robust.• Clarity is required on how these proposals will be applied to IDNOs and ICP contractors, both of whom are active in the street lighting connection industry.

Theme 7 - Provisions and guidance for determinations

Question 7a. <i>Do you agree with the issues we have set out under Theme 7 - Provisions and guidance for determinations? Are there any other issues under this theme that we should consider or be aware of?</i>	<ul style="list-style-type: none">• We agree with the issues set out.
Question 7b. <i>Do you have any views on proposal 7a (Ofgem to review the guidance for connection determinations)?</i>	<ul style="list-style-type: none">• DNOs require their complaints procedure to be followed before a complaint can be made to Ofgem. We agree that this is the correct procedure to follow to try and resolve issues, however when a dispute cannot be resolved it will need to be escalated.• Current experience in escalation to Ofgem is that that complaints take time to be acknowledged and resolved, if indeed a response is received. Any review should include standard times for responses and decisions.
Question 7c. <i>Is there anything else regarding Theme 7 - Provisions and guidance for determinations?</i>	<ul style="list-style-type: none">• No additional comments.

Additional Comments.

- Lane Rental Schemes are in place in London and some Counties. There is likely to be a more widespread roll out of these schemes to support revenue budgets. We see these schemes as an encouragement for DNOs to work more efficiently and promote collaborative working and we would welcome Ofgem's support with such schemes.
- Parking for DNOs to undertake planned works should not need to be directly outside the location of works if the site is within a bus lane, double yellow lines, clearway etc. This is often used as a reason not to plan connection works. This occurs frequently in busy urban areas and is not a suitable excuse for the DNO not to programme works. Local Authorities would like to see alternative and innovative ways of working that enables operatives to carry out works in these locations.
- Differing foundation and paving types used across the country need to be understood by the DNOs via good communication with Local Authorities so that correct materials are used. We are seeing more low carbon specification paving and flood alleviation materials being used and these must be maintained and replaced like for like when work is carried out.
- Following on from this consultation, ADEPT members would like to see an end-to-end review of the **faults** service. Below are several issues that Local Authorities experience with DNO fault service:
 - With the increasing normalisation and expected increase in demand on the street lighting asset as a minor structure to attach other powered devices to, (such as electric vehicle chargers, Wi-Fi/4G/5G, and CCTV enforcement to name a few) we would welcome a service level agreement with DNOs which would have an enhanced service to attend faults associated with such attachments.
 - Faults are put on pause for reasons that are determined by the DNOs with no consultation with Local Authorities. Faults are paused for things such as parking suspensions, road crossings, mains fault requiring letter drops – these should not be a reason to put a fault on pause as there is sufficient time within the GSoPs for DNOs to repair faults if they adequately plan their work and workforce.
 - The faults SLA should also consider repeat visits as it is often the case that these are not repaired adequately if each visit is treated as a new fault rather than an ongoing issue, which means the GSoPs payment for non-delivery cannot be implemented.
 - DNOs have also been known to demand payment from a Local Authority where a third party has damaged the DNO network, even when third party details have been provided. It is unreasonable to expect the Local Authority, i.e. the public purse to pay for an event which the Local Authority have not caused.
 - Timeliness and accuracy of DNO faults invoicing is an issue and can result in Local Authorities losing the ability to recharge third parties where the DNO refuses to try and recover the costs themselves. It is not uncommon for invoices to be received years after the initial attendance which can result in losses for Local Authorities as insurers require evidence of expenditure before settling claims.