

**Innogy plc**

Economic Regulation, Windmill Hill Business Park  
Whitehill Way, Swindon, Wiltshire SN5 6PB  
Tel 01793 877777 Fax 01793 892981

By e-mail only



John Benson  
Ofgem  
9 Millbank  
London  
SW1 P 3GE  
john. benson@ofgem.gov.uk

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Dear John,

**Development of multiple interruption and other standards for electricity distribution (Consultation document March 2002)**

In keeping with others and previous responses on this subject Innogy are supportive of the standards proposed by Ofgem in respect of multiple interruptions. We provide such support in the context of reasonable endeavours being used to ensure regulation in this area is applied on a transparent and equitable basis across the energy sector, electricity and gas.

Consequently we support the proposals within the relevant period and as part of the statutory consultation, on the accompanying draft determinations in respect of the overall standards of performance.

On a related issue, covered in Appendix 2 of the Ofgem document, we observe the action taken/proposed in respect of publicising to customers the introduction of the new multiple interruption standard of performance. We note also Ofgem's intention to update imminently its guidance on best practice in relation to performance standards. Innogy welcomes the proactive role taken by Ofgem and energywatch in publicising and bringing to the attention of customers this new standard.

We believe such a positive contribution might be carried through into "ongoing publicity" (Section 6, Appendix 2), with Ofgem indicating in the revised best practice guidance, how both parties might facilitate access by customers to information about standards of performance generally. On the electricity side suppliers are effectively backing off contractually metering GS/OS standards and are the conduit for payments/notice of rights for some 14 distribution companies, an administrative burden in terms of individual customer communications with which the two bodies might provide assistance and appropriate guidance. This might be in the form of fact-sheets, information on the relevant web-sites, views on whether such information can be provided on request rather than on a blanket basis, etc.

We hope you find the above comments helpful.

Yours sincerely,

**Alan Hannaway**

Alan Hannaway  
Economic Regulation  
Oak House, 1 Bridgwater Road, Worcester, WR4 9FP  
Tel. 01905-340508 Fax. 01905-340486 alan.hannaway@npower.com