

SP Transmission & Distribution
Detailed comments on draft Statutory Instrument:
The Electricity (Standards of Performance) Regulations 2005

Regulation 4, Paragraph 1, Section (a) (ii)

The present wording of this paragraph will result in events that cause between twelve and thirteen times the daily number of faults falling in a undefined band between a category 2 and a category 3 event. We would propose that Ofgem replace the words:

“conditions in which eight to **twelve** times the daily mean faults...”,

with:

“conditions in which eight to **less than thirteen** times the daily mean **number of** faults....”

Regulation 4, Paragraph 1, Section (k)

The thresholds for a category 3 event have been set on a consistent basis across the DNOs (i.e 35% of exposed customers). It is, therefore, reasonable to expect that the calculation of “total number of interrupted customers” should also be consistent across the DNOs. The present wording does not achieve this since the supply interruptions which result from faults on the 132kV systems of the England and Wales DNO’s would be included in their “total number of interrupted customers” whilst such supply interruptions in the two Scottish DNOs would not. We would propose that Ofgem insert the words shown below:

“.....whose supply is interrupted as a result of a failure of, fault in, or damage to the distributor’s distribution system **or other connected distributed generation, transmission or distribution system** resulting from category 3 severe weather conditions,

This wording would then also be consistent with the definition of an incident in the IIP RIG’s.