



Mr. R. Morgan  
Senior Connections Policy Manager  
Office of Gas and Electricity Markets  
9 Millbank  
London  
SW1P 3GE

Friday, 27 April 2007

Our Ref: ILE/Tech Com/DJC/03/07

Dear Mr. Morgan,

Review of Competition in Gas and Electricity Connections  
Proposals Document

I refer to the above document published by OFGEM and I am pleased to provide the following response on behalf of the Institution of Lighting Engineers.

With the increase in national investment in street lighting replacements it is vital that changes are made to the current method of service connections in order to ensure the provision of a more efficient and cost effective service.

The introduction of a national Service Level Agreement, (SLA) in April 2005 was seen by many as a major step forward in that it would help to improve the performance of the DNO's by formalising service provision and ensuring common definitions, conditions and response times. Unfortunately, in most cases there has been very little improvement in standards of service. We would like to see the SLA continued and for the DNO's to have to continue to report their performance to Ofgem. However we believe that the SLA needs to be strengthened by the introduction of nationally agreed minimum standards of service which stretch the DNO's performance, not minimum benchmarks, and the introduction of penalty payments for non performance. These minimum standards of performance should be subject to improvement by local negotiation.

There is concern that some DNO's are unwilling to enter into the standard SLA's with local authority's and have been less than co-operative. We would request that a nationally agreed SLA be made available to all local authorities and that all DNO's be required to implement and operate one. Similarly we have received information and comment about the accuracy of the data supplied to Ofgem by the DNO's and would suggest that such data be agreed in writing by the local authority before it is submitted and that the DNO should confirm this as part of their submission. We believe that it would be sensible for this data to be collected per local authority rather than on an overall DNO basis. This would allow easier comparison between authority's and determination of where the system is working or failing.

We have received evidence that some local authorities receive far better performance from the DNO than other authorities in the same DNO area. Indeed we have received comments



from one authority that they have no problems with the system and have got the best working arrangement they could ask for with direct access to the nominated jointer resulting in no aborted work, delivery on time and no problems. This is in stark contrast to other authorities in the same DNO area who report nothing but problems and delays. We should seek to ensure that each authority has the same standard of service as the best.

We note your proposals for minimum performance benchmarks which have been derived from the average performance of the DNO's as reported. Whilst we appreciate that such standards need to be practical we are concerned that the proposed benchmarks do not stretch the capabilities of the DNO's and need to be set higher. We are also concerned that the suggested benchmarks do not impose any requirement on the DNO to complete the works i.e. in all cases there is a residual element of works still to be completed of between 10 and 20%. It is often these residual elements that remain unfinished for considerable times resulting in undue publicity and aggravation to the local authority from the residents.

We list below our suggested proposals for the minimum standards.

	Definition	Minimum benchmark	Preferred target
<b>Standard 1 – Faults</b>			
Emergency Fault repair	Work necessary to remove immediate danger to the public or property arising from the electricity distribution network associated with street furniture.	80% in 2 hours  Report against emergency repair undertaken > two hours	95% in 2 hours  Report against emergency repair undertaken > two hours
High Priority Fault repair	Work that is urgent but would not require attendance out of normal working hours to restore or remove electricity supplies to street furniture e.g. at the site of an accident blackspot, major road junction, pedestrian crossing facility, an area of public order concerns, a reoccurring fault.	50% in 1 day 90% in 10 days  Report against high priority fault undertaken > 10 days	75% in 1 day 100% in 10 days  Report against high priority fault undertaken > 10 days
Multiple Units fault repair	Fault on service, for example no current, low voltage, faulty cut-out (i.e. electrically distressed), loss of neutral and high earth impedance affecting more than one unit.	75% in 10 days 90% in 20 days  Report against multiple unit fault undertaken > 20 days	90% in 10 days 100% in 20 days  Report against multiple unit fault undertaken > 20 days
Single Unit fault repair	Fault on service, for example no current, low voltage, faulty cut-out (i.e. electrically distressed), loss of neutral and high earth impedance affecting a single unit.	60% in 10 days 80% in 20 days  Report against single unit fault undertaken > 20 days	75% in 10 days 95% in 20 days  Report against single unit fault undertaken > 20 days



	Definition	Minimum benchmark	Preferred target
<b>Standard 2 – New Works</b>			
New Works1 – 10 jobs	May include the following: new capital lighting schemes, road improvement schemes, provision of connection/disconnections, service transfer, new service and disconnections.	60% in 15 days 90% in 30 days  Report against new works 1-10 jobs undertaken > 30 days	75% in 15 days 100% in 30 days  Report against new works 1-10 jobs undertaken > 30 days
New Works11 – 50 jobs	May include the following: new capital lighting schemes, road improvement schemes, provision of connection/disconnections, service transfer, new service and disconnections.	70% in 25 days 90% in 35 days  Report against new works 11-50 jobs undertaken > 35 days	75% in 15 days 100% in 35 days  Report against new works 11-50 jobs undertaken > 35 days

NB. We would prefer to see the phrase “minimum benchmark” replaced by “target”. We have remained with the term “days” but would like to see this clarified as calendar days as against working days and would suggest the following definition as “Working Day” means 07-00 hours to 18-00 hours Monday to Saturday inclusive but excluding national Bank Holidays.

Your proposals to monitor the DNO’s performance are welcomed however we would like to see this monitoring being done throughout the year and not left for a full year. Local authority’s have suffered from poor service from the DNO’s for far too long and would like to see some action being taken to address this problem. We believe that Ofgem should ensure that the DNO’s do not abusing their monopoly powers and be prepared to act if this is demonstrated.

The poor take up of the triangular arrangement by highway authorities is of concern and we believe that this is due to bureaucracy and difficulties of implementation. However, we are hopeful that the recent trial in Caerphilly will help to overcome many of these problems and give a clear implementation model that other authorities can follow. The principle of using a list of contractors approved by the DNO has much to recommend it provided the approved contractors are willing to provide this service direct to the local authority and no undue pressure is placed on them by the DNO’s. Rent-a-Jointer schemes have similarly had a very small take up which we understand to be due to the unrealistic requirement of many DNO’s requiring multiple weeks of continuous work. This could be overcome by more flexibility in programming and the use of this arrangement for smaller packets of work such as on a week by week basis as required. This would allow local authorities to better programme their works in conjunction with the DNO’s. The proactive promotion of the triangular and Rent-a-Jointer arrangements including model documentation by both the DNO’s and Ofgem would be of great assistance in helping to establish both of these systems of working.

The removal of the one metre rule to allow live working on any part of the service cable would increase the quantities and types of work that could be competitively carried out making such arrangements more applicable to competition and would, we believe, increase take up and competition. We fully support the removal of the one metre rule to allow all works on the service cable and would look towards this being extended on to the DNO’s mains following a



*Institution of Lighting Engineers*

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suitable trial period to demonstrate that this type of work can be carried out safely. Such works should be limited only by the contractor's accreditation. The use of the DNO's approved contractors would help to reduce any safety issues and should provide confidence to the DNO's that their systems are being protected, however, this should not restrict other suitably accredited contractors from carrying out such works.

I hope you find these comments to be constructive and of assistance, however, if you need any further clarification please do not hesitate to contact me directly.

Yours sincerely

**DJ Coatham**  
**Technical Services Manager**