Response for OFGEM SLA trail proposal document

Dear Sirs,

Following the publication of the Review of competition in Gas and Electricity connections proposals documents and in accordance with the agreement made at the Champions meeting on 13/03/2007, Kent County Council would make the following points.

- 1. KCC agree that the service from the DNO is not fully satisfactory and provides a full 1% out of lighting for the stock held in Kent. In supporting the OFGEM proposals, Kent fully endorse the requirement for an improved service performance and a variation to competition in the area of electrical connections although Kent and EDF Energy are having workshops to try and improve the service.
- 2. Performance improvements in the area of Fault repairs and new service connections in the proposed document do not fully address the problem and KCC would recommend the performance figures under the heading "Required performance"

Standard 1 Fault repairs	Definition	Minimum	Required
	, and the second	performance	performance
Emergency Fault	Work necessary to	80% in 2 hours	100% in 2
repair	remove immediate		hours
	danger to the	Report against the	Report against
	public or property	other 20%	any task which
	arising from the	undertaken in	cannot be
	electricity	excess of 2 hrs	undertaken
	distribution		within that
	network associated		time to allow
	with street		the LA to take
	furniture		appropriate
	(Call outs)		action
High Priority Fault repair	Work that is urgent but would not	50% in 1 day	75% in 3 days
	require attendance out of normal	90% in 10 days	100% in 10 days
	working hours to	Report against	Report against
	restore supplies to	high priority fault	any task which
	street furniture eg	repairs undertaken	cannot be
	accident blackspot,	in excess of 10	undertaken
	major road	days	within that
	junction,		time to allow
	pedestrian		the LA to take
	crossing, area of		appropriate
	public concern		action

Multiple Unit fault	Fault on the service affecting	75% in 10 days	75% in 10 days
repair	more than one unit	90% in 20 days	100% in 20
	NB . It would be easier if the service affected more than 5 units or a complete road.	Report against multiple unit repairs which cannot be undertaken within that time	days Report against any task which cannot be undertaken within that time to allow the LA to take appropriate action
Single unit fault repair	Fault on the service affecting a	60% in 10 days	60% in 10 days
•	single unit	80% in 20 days	80% in 15 days
		Report against single fault repairs which cannot be	100% in 20 days
		undertaken within the time	Report against any task which cannot be undertaken within that time to allow the LA to take appropriate action
Standard 2 – New works	Definition	Minimum benchmark	Required performance
New works 1 – 10 jobs	May include new capital schemes,	70% in 15 days	60% in 15 days
joos	road improvement, provision of	90% in 30 days	100% in 30 days - unless
	connections and disconnections, transfers, new service and disconnections	Report against new works which cannot be undertaken in that time	there are traffic management procedures when the works will be programmed but they should be completed within 40 days at the latest.
New works 11-50 jobs	May include new capital schemes, road improvement,	70% in 25 days 90% in 35 days	70% in 30 days
	provision of	70 /0 in 33 uays	days - unless

transfers, connections and disconnections, new services and disconnections	Report against new works which cannot be undertaken in that time	there are traffic management procedures when the works will be programmed but they should be completed within 60 days
--	--	---

- 3. It should be noted that some performance figures have been increased and some have been reduced. In addition a brief explanation of why the alterations have been made is included.
- 4. Kent already have from EDF Energy a customer survey on a regular basis, however, that does not include any activities to address any concerns and identified problems. Further consultation with the DNO will be carried out
- 5. Costs to cover works from EDF Energy were increased in April 2006 by up to 30% in some cases. They have been further increased from April 2007 by another 6.5% and there is a proposal to further increase these costs in November 2007. KCC find this unacceptable as it then becomes impossible to budget for a complete year and the total increases over 18 months is excessive for the same levels of service against which Kent have made representation as noted above. A copy of the correlation sheet for EDF Energy costs is included as an appendix to this letter.

Chapter 4 responses to questions.

- a. KCC agree with the package of best practice principles as laid down by OFGEM
- b. KCC feel that there could be standardised forms for fault applications and new service connections across the complete EDF Energy area.
- c. KCC feel that there must be a single point of contact for all works with EDF Energy as opposed to the seven points currently endured by KCC
- d. KCC question the use of a test certificate for transfers and new connections when EDF Energy do not even program works until they are in possession of a test certificate. They should program when the application is made and accept that the test certificate will be available when they attend the job. It is then up to the LA to ensure the unit is ready for connection to meet the EDF Energy date for service connection
- e. Improved communications from the EDF Energy team must be introduced to ensure that all parties are aware of what is happening
- f. As EDF Energy is allowed to charge for aborted calls when they have not contacted the LA, and the abortion cause is not acceptable, then the LA must be able to challenge that charge.
- g. Where EDF Energy fail to respond within the 2 hours for emergency call outs and the LA contractor has to remain on site at LA expense then the LA

- must be allowed to recharge the additional costs for non-performance back to EDF Energy unless the reasons have been forward to the LA and agreed
- h. KCC agree with the reporting arrangements but feel that specific guidelines must be drawn up and adhered to

Chapter 5 responses to questions.

- a. The response to question 1 is detailed in the table above
- b. KCC accept that the scope of contestability should be based upon contractor accreditation rather than the 1 meter rule

Should you have any further questions or require clarification then please do not hesitate to call me on 01474 544039

Yours faithfully

DA Burt Street Lighting Engineer West Kent Division Kent Highway Services