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Connections Policy
Office of Gas and Electricity Markets
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Your ref

Our ref

Date

GPH/MD/BJN

26 March 2007

Dear Sir

Review of Competition in Gas and Electricity Connections Proposal Document

Thank you for the opportunity to comment on the proposed document. Whilst we support much of the proposal, there are parts of the document that do not address the public's needs.

3. Metered connections: Introduction of a licence condition.
IDNOs represent a performance, communication and financial difficulty for local authorities. We would like to see measures that minimise these difficulties and the resulting costs to the taxpayer.
4. Promotion of convergence and good practice in electricity connections.
4.16-4.65 We support these proposals.
5. Unmetered electricity connections.
 - 5.1 The trial SLA should become a national street lighting agreement.
 - 5.3 There should be a requirement for DNOs to provide detailed reporting data to LAs prior to submission to Ofgem with sufficient time for LAs to comment on the content.
 - 5.4 The performance benchmarks have been derived from average performance; we would like to see them derived from above average performance such as the 90% for metered connections. Also, there should be a methodology for continuous improvement as required by the relevant performance indicator 215B. In particular, the requirement that 20% of emergency faults (where there is a risk of life) may never be done is unacceptable from a health and safety perspective, there needs to be some benchmark for 100% of emergencies to be completed.

Graham Harding BEng CEng FICE FIHT MCMI

Executive Director of Environment

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Bev/Mar/26BJN01 MD



2003-2004
Supporting the Rural Economy
2004-2005
Transforming the School Workforce
2006-2007
Positive Youth Engagement
(in the Community and
Democratic Process)

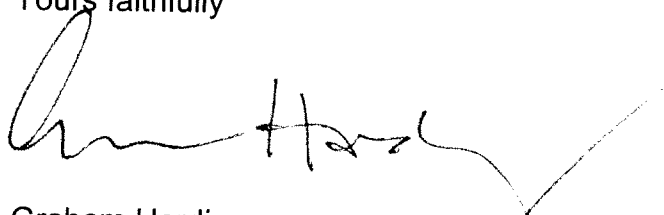
5.5 This authority believes that the use of incentives or penalties will improve DNO performance.

5.8 There are several difficulties in setting up tripartite arrangements. Local authorities have strict requirements with regard to procurement of works and there is no model document for connections procurement. Efficient cost effective delivery requires the combination of connections with works contracts; sometimes existing works contracts may have several years before they are due for renewal. There is a requirement from DNOs for compliance with their individual work procedures; in our view, ICPs should be competent to a national standard. The scope of work is restricted, in particular the one metre rule and the connection of non-plastic cables should be opened to competition as 5.11-5.18.

5.9 We support this proposal.

I trust this information is sufficient for you to reconsider the proposal, if not please contact Martin Dunwell on 01772 534589 for additional information.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Graham Harding', with a large, sweeping flourish at the end.

Graham Harding