

Proposals Document Responses by P N Daly Ltd

Chapter 3

Q. 1 : It is essential that a licence condition is introduced

Q2. : In general the cumulative effect of the current extended timescales is such that the economy of the country is suffering. While the proposals are an improvement, they could be improved immensely. e.g. The proposed timescale for production of an LV PoC is far too high. It is seldom more than half an hour's work.

Q3 : The ability of the DNO's to interpret the proposals to suit themselves and their track record of providing highly dubious compliance statistics mean that Ofgem will need to ensure that their powers are used to keep the DNO's in line. One particular area, which needs to be clarified and emphasised is that DNO's, who quote to the end client while withholding PoC information from an ICP, will leave themselves open to serious penalties. This has got to be made crystal clear to them.

Q4 : We are fully in favour of a supporting guidance document to reduce the scope for the DNO's to re-interpret the document.

Chapter 4

Q1 : Yes apart from point 4, where we do see the meaning or need for the section "and providing PoC information for quotes over £20k"

Q2 : The speed of resolution of complaints needs to be addressed. It is so slow that the DNO's can ensure ICP's are unable to obtain a sufficiently rapid resolution to enable them to compete for a project. What is even worse is the effect on the reputation of an ICP as an efficient service provider.

Q3. As with Ch3, Q4, we are fully in favour of a supporting guidance document to reduce the scope for the DNO's to re-interpret the document.

Chapter 5

Q2: We are fully in favour of removing the restrictions on competent ICPs preventing them from jointing onto DNO laid mains.

To clarify our understanding of the market

- At present a qualified ICP can undertake live jointing on DNO laid service cable up to one metre from the main. Allowing connections by ICPs to service cable installed by a DNO will make a miniscule difference, if any, to the opening up of competition.

- We are not aware of any restriction at present on qualified ICP's undertaking live jointing onto self-laid mains.
- The only work then left to be opened up to competition is the making of service joints onto DNO laid mains.

Can we assume that under Item 5.18 we will “not be restricted from undertaking jointing works” in the latter category? If this is not the case then you can be assured that there will be no improvement in the current infinitesimal level of competition in the unmetered connections market.

P N Daly Ltd
30 March 2007