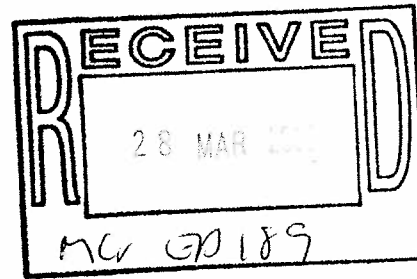


Environment Directorate

Sonia Davidson-Grant Corporate Director
County Hall, Taunton, Somerset TA1 4DY



Connections Policy
Ofgem
9 Millbank
London
SW1P 3GE

please ask for
Trevor Gutteridge

extension
01823 423366

my reference
HL/10/005/tjg

your reference

27 March 2007

Dear Sir

REVIEW OF COMPETITION IN GAS AND ELECTRICITY CONNECTIONS PROPOSALS DOCUMENT (FEBRUARY 2007) UNMETERED ELECTRICITY CONNECTIONS

You have invited comments on the above document and although the SW Champion will be providing a collective response for the South West Authorities I give below Somerset County Council's individual comments relating to the proposals:-

Service Level Agreement

We believe that the unmetered market should be treated similar to the metered supplies and covered by a licensed agreement and hence subject to penalties.

The minimum benchmarks quoted are not good enough and we cannot understand why they are lower than those cited for metered supplies. It is understood that they derive from an average figure from the data received during SLA trials but this would indicate that poor performers are being rewarded. We would prefer to see minimum benchmark figures of around 90% or higher.

The benchmark data as documented do not cater for any jobs that 'fall over the edge' and are not picked up by the proposed benchmarks. In order for this to be addressed it is recommended that 100% targets should also be included. For example, Table 5.1 Page 27 – Emergency Fault Repair; 90% in two hours and 100% in five hours.

As penalties would be incurred for non-conformances or poor performance there will need to be some form of 'exception' arrangement whereby LA's and DNO's can discuss and agree particular jobs that will be exempt from non conformance rebates.

The original benchmarking that is agreed should be the subject of discussions with the DNO's with regard to the need for continual improvements in service.



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It is essential for both LA's and DNO's to appoint named persons and to retain a register of named persons who will be made available for the resolution of any disputes that may arise.

Competition in Connections

For any triangular agreement to work effectively it needs to be supported by a robust and meaningful Service level Agreement.

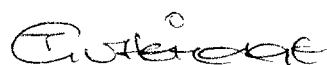
LA's require an improved and easier process in setting up the agreements and hopefully this will come naturally in due course.

There should be an option for the LA's to place instructions for work with both ICP's and DNO's.

It will be necessary to investigate the anomaly that appears to have created whereby ICP accreditation through Lloyds and other approved is a national accreditation whereby most DNO's do not seem to recognise the transfer of any accreditation from one DNO area to another.

I hope the above comments are of some use to you and if you need any further information please do not hesitate to contact me.

Yours faithfully,



Trevor Gutteridge
Highway Lighting Manager
cc Mark Johnson, Devon CC
Lee Evans, Caerphilly CBC