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Connections Policy
Ofgem,
9 Millbank
London SW1P 3GE

28th March 2007

Our reference:RB/SL
Your reference:

Dear Sir

RE: Consultation on Unmetered Power Supplies

West Sussex County Council has two DNO footprints within its boundaries, these DNO's provide 70,000 individual unmetered supplies to items of street furniture, mainly street lighting. We are currently far from satisfied with either the cost nor the services received from these DNO's and despite our attempts to work with them to initiate improvement we have to date been unsuccessful.

Question 1: Do you agree with the proposed minimum benchmarks for the SLA?

We fully agree with the principle of benchmarking without which there can be no measure of improvement. Our concern is the unacceptably low target base proposed.

We can understand that existing service levels should be acknowledged but we should be encouraging continuous improvement through achievable improved targets.

We suggest that a move away from the imposition of financial penalty to one of payment for performance be introduced. With such a scheme the DNO input would be recognised in the form of higher payment for achieving target but lesser payment would apply for longer completion times.

Question 2: Do you agree that the scope of contestability should be based on contractor accreditation rather than the 1 metre rule?

We believe that the 1 metre rule is a distraction. Real progress will not be made until suitability insured and accredited contractors can be contracted to make connection to any part of the Low Voltage distribution network. Similarly there

should be no distinction between types of cable construction be it plastic or paper/lead when authority is given for connection.

Competition

We believe that the best interests of the residents of West Sussex can only be achieved through the implementation of full competition without qualification such as the 1 metre rule.

We fully support the 4p's recent response to your consultation and agree that DNO's effectively operate local monopolies. These have led to:

- Unsatisfactory performance
- A lack of transparency and accountability in relation to costs
- Bureaucratic inefficiencies that are counter to principles of value for money
- Lack of operational capacity

We are particularly concerned at the anti competitive establishment structures of some DNOs and how the closeness of their operations for street lighting connections and street lighting contracting can give commercial advantage to their contracting arms.

Thank you for this opportunity to make these comments; we look forward to the publication of the consultation results and conclusions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Bird', with a stylized, overlapping structure.

Richard Bird
Team Leader – Street Lighting