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10th August 2007

Standard Licence Condition 4F. Standards for the provision of non-contestable connection services ("SLC4F") – Consultation on Draft Guidance document version 1

Dear Nicola,

Central Networks welcomes the opportunity to respond to the consultation on the draft Guidance Document of the proposed Standard Licence Condition 4F, this response also covers comments in respect of Licence Condition 4F ("SLC4F"),

Please note that our response is on behalf of both Central Networks East and Central Networks West, the two distribution licence holders.

Standard Licence Condition ("SLC 4F") Comments:

Further to our letter of 30th March 2007, we are disappointed to note that our detailed comments provided in Appendix 1 highlighting specific concerns relating to performance, scope and timescales have been overlooked in respect of the licence condition, please find attached a copy of this letter for ease of reference. Our concerns remain that certain targets are neither practical nor achievable.

It is disappointing to note that fundamental errors remain in both the licence condition and the 4F Guidance Document version 1,

It is also disappointing to note that some of the work carried out by the ECSG sub-group in the drafting of this licence condition

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does not appear to have followed through into this document, or an explanation provided to delegates have not been considered/included. In particular these concerns include:

Introduction

- 1(a) "connections" needs defining.
- 2(b) the prerequisites in terms of design submissions, such as scope and quality, need defining to fit into this specification.

Interpretation

There are a number of definitions or words used that appear to be inconsistent across both the guidance document and the licence condition, this requires attention.

- "diversionary works: the word "Works" should be used as opposed to "Service", and "things" amended to read "assets".
- The definition of "energisation" should read "the works necessary to enable an electrical current to flow.....". The use of the terms "energisation" and "exit point" need to be consistent and allow for generation too as they currently only relate to load related connections.
- (In the guidance document) "information" has been defined using the word "information" please reconsider.
- phased "energisation" should be replaced with "connection"
- In the definition of "point of connection", "premises" should be replaced with "contestable works", and then "contestable works" should be defined.
- "point of supply" and "exit point" need defining as terms, we suggest the following: "point at which electrical current leaves or enters the licensee's distribution system". The term "point of supply" on

many occasions within the two documents would be more applicable than “point of connection”.

- “reinforcement works” include the word “capacity” between “increased” and “connection”.

Appendix 1: Schedule of Services and Standards

S3 (a) & (b) “final works” and “phased energisation”: the standards for both should be raised to 25 working days.

3(d) low voltage energisation: the standard should be raised to 10 working days as opposed to 5 working days

3 (e) high voltage energisation: the standard should be raised to 20 working days due to practical constraints such as operational switching schedules (please see the attached response)

Calculation of time: 5pm deadline should be replaced with midday on that working day.

Standard Licence Condition 4F Guidance Document ref: 181/07

2. Definitions and overview of standards

2.3 Applicant: We note that whilst this definition is included in the guidance document it should also be included within the standard licence condition to provide absolute clarity as to who the applicant actually is.

2.7 Information is unclear and should provide such detail as is necessary in relation to the provision of non-contestable connection services given by a DNO, particularly, scope should be defined.

2.19 Working day and reporting performance against timescales

CN disagrees with Ofgem’s views on the working day time-period, particularly in that information could be received as late as 5 pm, which in our view means that a day is lost on the performance timescales, we believe that a 5 pm deadline is inappropriate however, whilst we note that in

the guaranteed standards, a deadline of 4pm is used, CN believes that a deadline of midday would be more fair and appropriate.

The notes on guidance clarify this part of the condition adequately.

3. Conditions precedent

3.1 CN strongly asserts that all legal requirements must be completed including relevant adoption obligations, third party consents and the requirements for notices under NRSWA prior to the **actual request** for final works or phased energisation. As not to do so would be tantamount to discrimination with any Section 16 application.

3.3 Reasonable timescales for cancellation

The term "reasonable timescale" is rather subjective
We would expect a formal notice to be made for the cancellation of connection.

5. Audit and Licence Conditions reporting arrangements

5.10 CN requires clarification of the reporting period suggested, is the annual basis a rolling 12 months – or is it April to March?

I trust that you will find the above comments useful though should you wish to discuss any of these points in more detail please do not hesitate to contact me.

Yours sincerely

John Hill
Senior Contracts Executive