

Roger Morgan  
Senior Manager  
Connections Policy  
Ofgem  
9 Millbank  
London  
SW1P 3GE  
[connections@ofgem.gov.uk](mailto:connections@ofgem.gov.uk)

1 August 2007

Your Ref: Ofgem doc 181/07

Dear Roger

**Standard Licence Condition 4F - Standards for the provision of non-contestable connection services ("SLC 4F") - formal licence modification and guidance document consultation**

energywatch welcomes the opportunity to respond to the issues raised by this consultation. This response is non-confidential and we are happy for it to be published on the Ofgem website.

We have had an opportunity to read through the proposed licence condition SLC 4F and the guidance document and believe that these are fit for the purpose for which they have been developed. However, we do have the following comments on SLC 4F and the guidance document:

- there should be consistency of language between SLC 4F and the guidance document (SLC 4F taking precedence) to avoid misinterpretation, e.g. the definitions of terms such as 'diversionary works', otherwise any inconsistencies should be clearly explained;
- all affected licensees should adhere to the baseline 90% performance measure for requests. We note that one DNO wishes to dilute the performance measure. However, those consumers who contact energywatch about connections issues often highlight problems with timescales which occur once an application for connection has been made. This is why the licence condition has been proposed and it is for DNOs to establish robust internal processes for meeting the timescales and performance measures stated in SLC 4F;
- the applicant must have clarity about the minimum requirements for a request in an accessible and understandable form so that there are no undue delays in the processing of the request. We believe that 5 working days is sufficient time for licensees to contact applicants and clarify these matters with them to avoid undue delays;
- it is critical to the effectiveness of SLC 4F that Ofgem undertakes effective monitoring and enforcement action where breaches are alleged by applicants.

Only if SLC 4F is applied effectively will consumers and other applicants believe that their concerns are being taken seriously and licensees act accordingly to meet their obligations.

Going forward, we will keep the implementation of SLC 4F under review through any issues raised with us by consumers and others.

We would appreciate being kept informed of the progress of the consultation and any related issues to enable us to comment as the need arises.

If you do wish to discuss our response further please do not hesitate to contact me on 0191 2212072.

Yours sincerely

Carole Pitkeathley  
Head of Regulatory Affairs