

Paul Newman

Subject: OFGEM consultation - DNO performance

Dear Rachel

1. We Amey Wakefield support the initiatives developed by OFGEM generally, but remain concerned about the continued lack of significant progress in developing competition in connections, options and choices, and the lack of consistency across DNO's with regards to un-metered supply connections delivery, choice and prices.
2. We believe that competition in connections has been limited because DNOs have been allowed to resist competition by limiting the scope of works available, introducing barriers through the accreditation and approval process to work on their network and by the audit regimes and charging mechanisms they impose. This has resulted in high set up costs for ICPs and has presented very limited business opportunities to engage ICPs. These should all be simplified and audited?
5. We believe that ICPs are being influenced by DNO pressures and risks of losing other DNO works / contracts if they show interest in ICP delivery direct for customers. This has / is restricting ICP interest in contestable activities and should be investigated and actioned by OFGEM.
6. All DNOs should publish their scope of "contestable" works and not hide behind safety for limiting the scope of works i.e. no disconnections as these must be close to the main. Limitations of 2m for service transfers, Live Jointing trails even though ICPs are Lloyds accredited etc?
7. DNOs must audited to ensure that they are not imposing different requirements on ICPs as to their internal DLO / Affiliated businesses i.e. disconnection and other policy inconsistencies between DLO and external ICP?
8. We believe that a broader scope of works and simplified access would encourage greater interest in ICP services and we encourage the inclusion of the final closing joint to the LV mains to be made "contestable".
9. We strongly request that OFGEM ensure DNO's are adequately policed and audited to the appropriate and detailed level against the proposed competition tests on an annual basis as self-auditing / self declaration does not appear to have produced the industry-wide improvements required.
10. We strongly request greater OFGEM involvement and action where DNOs continue to obstruct or delay competition initiatives.
11. We would ask that OFGEM ensures and checks through audits, that a more consistent and transparent approach is taken by all DNO's

Regards

Steve Hewitson

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Amey LG Ltd