

Paul Newman

Subject: Dudley MBC - Response to DPCR5 consultation

f.a.o. Rachel Fletcher

Having taken a short while to look through the DPCR5 proposals document, I generally welcome the proposals in relation to unmetered electricity connections.

Most of these proposals are identifiably based on the requests from the end users' and contractors' bodies for reform of the unmetered connections industry over the last fifteen years and as such are most welcome. Particularly welcome is the replacement of the existing SLA with a guaranteed set of standards (10.17), plus a change of licence conditions to allow penalty payments (Appendix 3, Table 4) as in my opinion a lack of incentives has been instrumental in continued poor service by the DNOs.

Also welcome are the proposals to widen the market (10.40). As the DNOs have taken on board the changes that are likely to be required under DPCR5, some of them are starting to open up competition by putting into place the structures that would be required to facilitate it. In our area, Central Networks have publicised the Live Jointing Trial Agreement more widely and the parent company has set up an affiliate ICP, E-On Highways Lighting, with whom we are now contracted for an interim period until a fully competitive tender can be entered into.

I am assured by Central Networks that all the facilities offered to Highways Lighting would equally be offered to other ICPs that may wish to enter the local authority highway connections market. The timescale for widening the market, setting the competition test at December 2013, would seem to me to be a little too long especially as, given the current economic climate, I'm sure that ICPs would be keen to enter this potentially lucrative market. I would prefer to see it set at 2012 or even 2011.

One point I should like to make is that any standards, whether SLA or Guaranteed Standards, have to be both measurable and agreed by both the DNO and its client. At the moment this has proved problematic as we are unable at present to agree the measured output of our DNO owing to a lack of information provided on works completion, and such information that is provided is not contemporaneous. I should like to see in any new agreement a compulsion on DNOs to provide a real time information service on works completion that would allow PLAs to indicate to OFGEM acceptance or otherwise of the DNO's performance figures.

Also welcome is the proposal to end the 'one metre rule', depending instead on accreditation as a means of ensuring competence. I note that the ECSG is working on proposals further to extend the scope of competition and their results are eagerly awaited. In the meantime, as indicated above our host DNO have said that any ICP required by its client to provide Non Contestable works will have a guaranteed Rent-a-Jointer facility from them.

These are my initial feelings in relation to the consultation; I may make further comments once the content of DPCR5 has become more widely circulated in the industry and comment made. In the meantime I support any further comments that industry bodies, particularly the Institution of Lighting Engineers and ASLEC, may wish to make on our behalf.

Mel Harwood

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