

Paul Newman

Subject: DPCR5 Initial Licence Conditions Drafting Consultation

Dear Sirs,

Thank you for the opportunity to comment further on the evolution of the next DPCR.

BOC's comments are all general ones and may be cross-referenced to the Categories in Appendix 5

1 Customers

BOC believes it would be appropriate to add to the interruptions statistics to record the MWhr not supplied as well as just the time (CML) and number (CI) thereof. This could use the preceding HH as the volume measure and would indicate how often industrial consumers were cut off. If disaggregated from the total (or split LV/HV/EHV) it would be doubly valuable in quantifying BOC's impression that some DNOs are more reliable than others.

Clearly, a broad measure of customer satisfaction may be a useful headline criterion, but must be backed up by a few simple lower-level measures which address the concerns of I&C customers, who are about a third of the national electricity demand.

2 Environment

BOC supports the tightening Environmental requirements, and endorses the pragmatic use of target outcomes rather than pre-ordained processes.

4 Connections

Similar logic applies to connections; transparent and accessible reporting of the time and efficiency of new installations is clearly useful, but poor performance on a small number of EHV connections may be hidden within generally more positive results for smaller simpler LV ones. It would therefore be useful to see the following broken out: time from enquiry to connection, % split of completed /In progress/ Aborted and reason for project closure. Reliable connection performance should attract investment into a DNO's area, and therefore forms a valuable benchmark for investors, consumers and RDAs.

The regulated margin for connections should be adequate for incentivising competitive behaviours, but not set too high, or it will become an undue source of comfort.

5 Financial

BOC feels that this is an area requiring further clarification. At first inspection, it seems a sensible adaptation to the changing balance of supply and demand at the distributed level.

General

It seldom hurts to reiterate the bottom line of operation as a regulated monopoly; that poor performance will result in loss of one's licence.

In the event of any questions, please contact the undersigned in the first instance

Christopher Webb

Utilities Manager - UK & Ireland