

In response to your letter invitation (02.03.10) asking for views on the DPCR5 review process, I provide my comments below.

Whilst this was my first experience of a OFGEM review, I had an impression that it was also a 'first' in terms of greater customer participation. Customers - either individuals or organisations - are the main recipients of what the distributors deliver and should be a critical part of the process. Personally from my involvement with the connections work stream, we were most definitely at the centre of considerations and I recognise and praise this.

The success of any review relies substantially on the personalities leading it. Through the connections work stream I experienced some very challenging and robust thinking, which played a large part in getting as much work done and ground covered as we did. A major contributor to 'our' part of DPCR5 was Dora Guzeleva who 'drove' our workgroup much further than any of the DNOs expected - one of them admitted as much to me off the record.

I felt we were seeing a genuine passion for the customer's situation. Cynics may suggest that customers would say that as we were achieving a lot of progress, but I would stress there were similar amounts of compromise, with OFGEM remaining impartial. The product of the connections review is a great example of the sort of result achievable through a review, even in a complicated area.

I got the distinct impression that for many of the DNOs, this was the first time that they had spent so much time in close proximity with 'customers'. At times I'm not sure they knew where our endeavours were leading and were (sadly) defensive of the status quo - it was totally uncharted territory.

With regard to the other parts of the review, much of what probably happened and the results remains a mystery to even me - someone intimately involved with one aspect of that process. There was, no doubt, a lot of work and output from these other areas but a lot of it remains quite invisible to the customer. Whilst we probably should be spared much of the detail, the overall picture, milestones and results could be more visible.

With regard to the nine specific points raised on page 5 of your letter, I would volunteer the following:

- 1) In keeping you informed of the DPCR5 Process.
Good as far as my area of involvement was concerned. But, while I get the daily email alerts, there are a lot of messages coming out of OFGEM and sometimes something specific gets lost in all the other releases/ announcements/ etc. A desirable change would be to use more distinguishing factors in the email alerts (eg colour) to represent the different areas of activity in OFGEM.
- 2) In making ourselves available to those who had queries & concerns
The OFGEM staff involved with connections provided reasonable access, given my limited experience of contact between meetings and their work commitments.
- 3) In writing accessible decision documents that explained the underlying rationale for final proposals
Remains a weakness: Documents published by OFGEM throughout the process (and more generally) are long, detailed and very time-consuming. Running into hundreds of pages, these documents serve to discourage many customers / representative from engaging with OFGEM at all. I would urge OFGEM to be more concise generally in your published documents if you want to engage more with customers / their representatives.

4) In providing an opportunity for you to put your views across and influence the process

As above I felt that the connections part of the review was the first time customers had been so involved and this was a GOOD idea. What developed from the early aims was more debate and meetings than perhaps expected, plus a delay in achieving the end goals. It was a GOOD thing to cover what we did. This level of detail / participation should be considered as part of future reviews for anything involving customers.

5) In planning the project and setting the timelines for deliverables and responses to consultations

Commenting only on the connections work, our group ran out of time and could have covered more - disconnections, diversions were felt to be similar DNO problems, but we had to 'prioritise'. This level of participation and the output took some by surprise.

In the situation we had, stakeholders showed flexibility and (again) compromise in agreeing a delay in the start date for the changes. I felt this was a fair and equitable. This situation should NOT dissuade OFGEM from following the same engagement approach in future, just provide a little more time instead - better to start & finish early than late.

6) In requesting information and the type, form and level of information
The process made a lot of unexpected demands on certain participants at times. Most of these requests were fair in assisting OFGEM progress your work. I expect that some DNOs will feel they contributed more than their fair share. I would disagree with this as they were best placed to do a lot of what was produced. Customer could and did contribute to the process.

7) In the level of resources we employed throughout to deliver the project
There were times when I felt that OFGEM resource was stretched a little thin - throughout the process there were occasions when OFGEM staff would have to leave to do other things and then come back later... Whilst I know nothing of the internal workings within OFGEM, my instinct would be to provide a little more back office support if this process was repeated.

8) In the number type and form of meetings, working groups and workshops
The first ECSG meeting where the timetable was unveiled appeared to create a lot of surprise - there were far more meetings planned for DPCR5 than anyone anticipated. In hindsight this was still an underestimate for one of the groups. The meetings I participated in were just right, in that they brought balanced numbers of DNOs and users together under OFGEM 'arbitration' to shape and progress the debate. The format was good.

My recommendation here would be more notice of the work coming up and a longer run-up to the delivery date. Customer reps have other commitments and with more notice it may have been better to share some tasks.

9) In issues that may arise in light of our process in regards to implementing the findings of the RPI-X@20 project.
No further comments.

If there are any queries, do please contact me.

Regards

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