

Andrew MacFaul
Consultation Co-ordinator
Ofgem
9 Millbank
London
SW1P 3GE

19th November 2012

Dear Andrew

Re: Strategy consultation for the RIIO-ED1 electricity distribution price control – Ref: 122/12

I refer to the above document and consultation. The UCCG – as other interested parties – is keen to ensure that customer requirements are met by ensuring the scope of RIIO-ED1 is not artificially kept narrow to connections only. Many of the ad-hoc concerns raised by customers relate to the restoration of supplies, emergency attendance, replacement of cutouts and fault repairs – and include disconnections as well as connections and transfers.

We believe that the unmetered sector could be better served than it is by Ofgem – for example there has been no feedback at all on performance under GSoPs for the unmetered sector. The unmetered sector is one of the largest areas of activity in the electricity market and serves all the travelling public and most of the resident consumers in the UK through its population of in excess of 7 million lighting and signal units. We believe the unmetered sector performance should be separated out from other activity and the current proposed definition of major and minor works should be amended or added to as currently it does not apply to unmetered activity, since most of the work is individual connections, disconnections, emergency responses, repairs and transfers.

We also remain concerned that ICP activity may be being hampered or delayed – and that this is an area that requires some form of metric. We believe that ICPs should be considered as a DNO customer group in their own right – since this would assist in ensuring that successive DNO supervisory management at the point of delivery have the best interests of the consumer at heart. In addition the non-contestable activities carried out by DNO's which are associated with ICP activities should also be the subject of performance measurement.

Yours sincerely



Gareth Pritchard BTech (Hons) CEng FILP MIET TechIOSH
Chief Executive