

RIIO ED1 proposals – Unmetered

Local Authorities should be treated as a separate customer group for all DNO customer satisfaction incentive schemes.

- Applies to all other customers with very large volumes of existing DNO connections requiring frequent connection activities and repairs to be performed.
- LA's are accountable to vast numbers of customers and their performance in keeping the "street" lights on is very visible and highly dependant on the DNO's performance in repairing and renewing connections and maintaining supplies.
- LA's have very large DuoS accounts, and have tightly controlled publically funded budgets. They are very cost and service sensitive and need to ensure Ofgem recognises their needs are different to other major "commercial" customers who are better able to respond to competitive market forces.

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Unmetered RMS need to be redefined by project type/size rather than customer/funding type, just like the metered RMS.

- Removes risk of discrimination between customer groups
- Allows for incentives recognising DNO process efficiencies, minimum intervention and lower cost in delivering non contestable services geared to the project type/size.
- Allows customers with 1-off small volume and value “unmetered” connection activity to have the same regulatory protection and DNO incentive scheme as that proposed for customers requiring metered connection activity.

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Should have regulatory monitoring of DNO's performance in providing non contestable services to unmetered ICP's.

- Currently not covered by SLC15 or SLC15A so no visibility
- Most DNO's service is currently OK (as required for competition notice pass), but if ICP market share volume increases, DNO's will be tested.
- Need to encourage DNO's to offer a low cost, on-line ICP self-quote, self approve and self work call off service, to match some DNO's section 16 service?
- Most DNO's currently collect the data and some report, so a voluntarily arrangement for all should not be too onerous.

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Should have the same “average performance” incentive scheme for unmetered connection repairs as those proposed to replace other metered GSOP’s in SLC15A.

- We support the “average performance” approach for all remaining GSOP’s and for non contestable service activity under SLC15.
- Encourages DNO’s to be more flexible in treating some “LV service connection” repair works as contestable, using agreed safe methods.