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James Veaney
Head of Distribution Policy
Ofgem, 9 Millbank,
London,
SW1P3GE



Energy House
Woolpit Business Park
Woolpit, Bury St Edmunds
Suffolk IP30 9UP
T 07920 238095
F 01359 243377

By email only to: Connections@Ofgem.gov.uk

www.gtc-uk.co.uk

mike.harding@gtc-uk.co.uk

Dear James

Response to: Consultation on WPD's Competition Notice

GTC, through its subsidiary business The Electricity Network Company Limited, owns and operates an electricity distribution business which connects its distribution networks to the distribution systems of incumbent distributors. Since being granted our licence in 2006 we have faced, and continue to face, significant barriers to the development of an open and equitable framework that facilitates competition. Progress by DNOs has been slow, punctuated by procrastination and with a general lack of urgency to resolve issues.

However, following the introduction of the Competition Test initiative by Ofgem there has been significant progress by most (but not all) DNOs over the last two years. Whilst we are happy to support those DNOs that can clearly demonstrate that competition exists for the provision of connections in their Relevant Market Segment (RMS), such support is conditional on what has been delivered, not on rhetoric or on what is proposed for some future date.

Since entering the electricity connection market we have worked closely with WPD to assist them in understanding what would be required to ensure that their markets were open for competition. WPD have supported our entry into the electricity market by providing emergency cover within their original DSAs. Without this support we would have found it far harder to enter their DSAs due to the geography of the regions involved. It is frustrating that whilst we have discussed this issue to all of the other DNOs and explained the impact of providing this service to the benefit of the IDNO businesses so far only ENW have supported IDNOs in this area. Prior to the takeover of Central Networks (CN) we had built a strong relationship with CN and whilst we found that some areas appeared to be pulled back when WPD took over we have now found that WPD have worked hard to put in place a lot of the systems and procedures we were asking for. Whilst price can sometimes prove to be more competitive than the CN figures WPD do try to ensure that competition works. If we find issues the WPD team seem to resolve the issues without causing us timescale issues which is not replicated within all DNOs.

WPD have worked hard on the customer service side and we do find this replicated in the competitive market of new connections. We believe that WPD are one of the top DNOs that we work with across the UK. They have always been keen to discuss issues and find an acceptable solution within a reasonable timescale and looked to work together to the benefit of the end customer. Amongst the key areas that we have worked with WPD are the legal

process issue which is now being rolled out to all IDNOs; the extension of contestability at both LV and HV; provision of emergency response across their original DSAs; recognition of the benefits ICPs and IDNOs can have to improvements in WPDs network construction.

Whilst we support WPD's approach to competition in connections we are still working with them to develop better ways of working that will reduce timescales and remove unnecessary costs to both of our businesses. In particular we still would like to:

- Remove the need for boundary metering between us and WPD.
- Reduce the documentation required by both companies.
- Streamline the design process and allow GTC to be more in control of the overall timescale of delivery for projects.

In a presentation to DNOs at Ofgem in July 2011 the Competitive Networks Association (CNA) highlighted the actions they needed to take to facilitate competition in connections. In doing this the CNA compared and contrasted process differences for competition in electricity connections with those in place for gas, which is considered by the majority of operators in the competitive market as best practice borne out of significant pressure by Ofgas and latterly Ofgem. Extracts of the presentation showing the key differences between gas and electricity processes are shown in Annex 1. At the presentation we indicated that in responding to any competition test we would use this checklist as part of the competition test. The chart in Annex 2 indicates where we believe WPD in comparison to the gas sector and to the overall DNO market. Annex 3 provides responses to Ofgem questions.

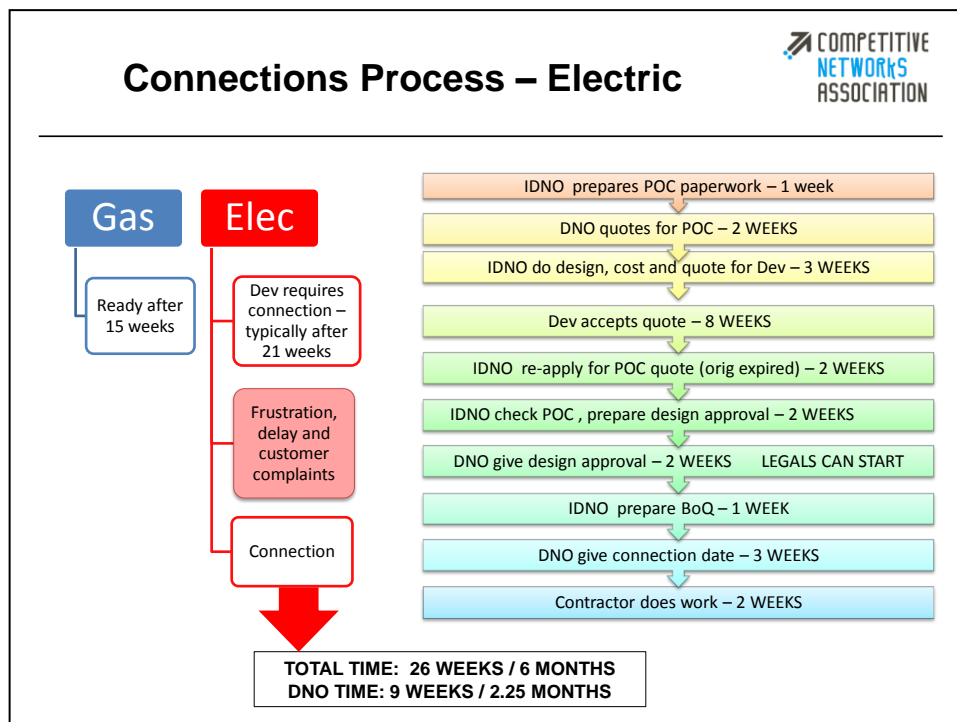
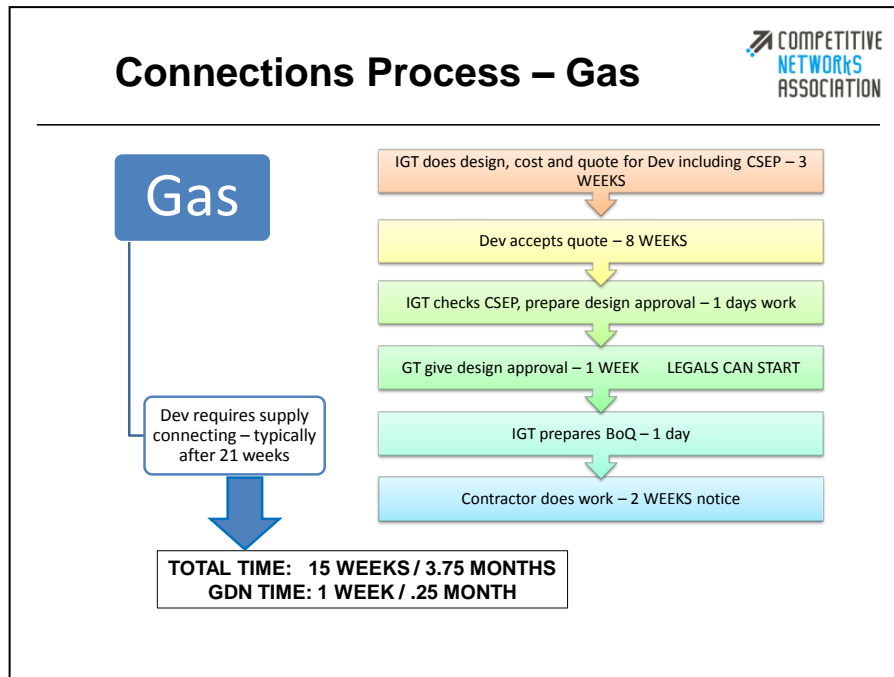
GTC believes that whilst in some areas market share in the WPD DSAs do not show that competition is working this is due mainly to the geography and the lack of competitors rather than WPD doing anything to prevent competition. GTC support WPD's application for a unregulated margin across all of the RMS's within their DSAs.

Yours sincerely

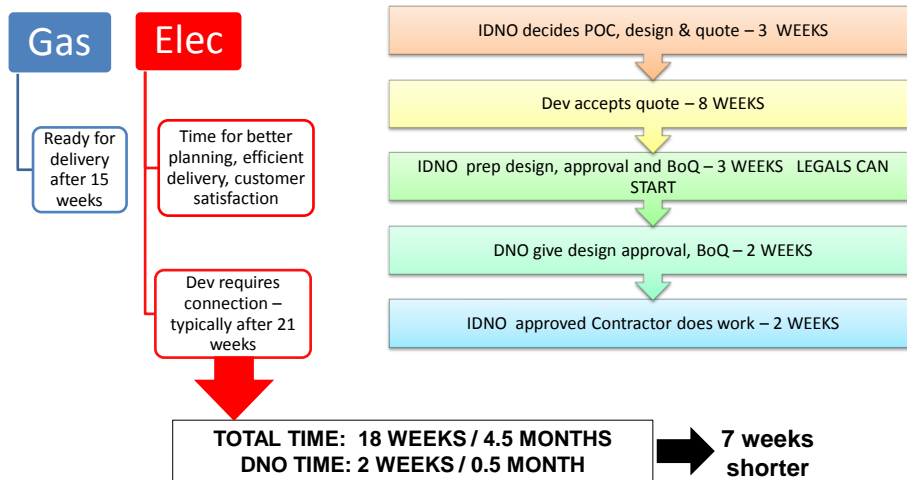
Mike Harding
Head of Regulation
GTC

Annex 1 Extracts from CNA Presentation to DNOs

Selected slides from the CNA presentation to the DNOs demonstrating the best practice timeline for gas, electricity current timeline and the required future state for electricity



Revised process



DNO involvement and delays significantly reduced!

Annex 2 Check list showing differences between Gas, Overall DNO market and WPD connections process.

Process Area	Gas	DNO Market	WPD
❖ ICP in control of meeting delivery to customers throughout connections process	✓	X	Partial
❖ Design process managed by the IGT/IDNO	✓	X	Partial
❖ No onerous application process	✓	X	Partial
❖ Process removes need for onerous inspection regimes	✓	X	Partial
❖ Self connection process in place	✓	Partial	✓
❖ Behaviour of Upstream Operator doesn't cause loss of work	✓	X	Partial
❖ No additional boundary constraints imposed by upstream operator	✓	Partial	Partial
❖ Legal/commercial issues agreed and in place	✓	Partial	✓
❖ Agreed Industry wide arrangements (formal agreements)	✓	Partial	Partial
❖ Emergency Response Agreements in place across the UK	✓	Partial	✓

Note:

Partial indicates where we have seen significant improvements over the last few years but we are still working with the DNO to refine the process.

Annex 3 Responses to Consultation

Table of the RMS and DSAs that are relevant to GTC.

Please check the RMS and DSAs that are relevant to you in the table below.

Relevant Market Segment (RMS)	WPD Competition Notice/DSA			
	South West	South Wales	East Midlands	West Midlands
1. Metered low voltage work (LV)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Metered high voltage work (HV)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Metered HV and Extra High Voltage (EHV) work	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Metered EHV work and above	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Distributed Generation (DG) LV work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. DG HV and EHV work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Unmetered Local Authority (LA) work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Unmetered Private Finance Initiative (PFI) work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Unmetered Other work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In providing details for the Competition Test GTC can confirm that we are involved in the highlighted RMS's within the DSAs shown in the table and hope to be involved in the 'Metered HV and EHV work' for all DSA regions in the future. GTC consider that we are able to respond on the relevant questions for all of these sectors.

Chapter Two

Question	RMS(s)	DSA(s)	Response
One: Are customers aware that competitive alternatives exist?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	The majority of customers that we talk to are aware that competition now exists. We do find that some customers at the outer reaches of the WPD DSA's have not seen competition but we believe this is due more to the fact that it is too difficult or costly for new entrants to work in this areas.
Two: Do customers have effective choice (i.e. are customers easily able to seek alternative quotations)?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	In the major areas of the WPD DSAs we believe that customers do have an effective choice and we generally see customers requesting quotations from two or more competitors..
Three: Does WPD take appropriate measures to ensure that customers are aware of the competitive alternatives available to them?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	We are aware that WPD have held seminars with customers but we are not aware of how effective these have been..

Question	RMS(s)	DSA(s)	Response
Four: Are quotations provided by WPD clear and transparent? Do they enable customers to make informed decisions whether to accept or reject a quote?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	WPD are still working on this area and we have not seen any transferable offers that have been made to customers. This is an area that most DNOs are working on and we expect WPD to embrace this is the future. We sometimes find quotations confusing but normally we can speak to a designer to clarify the issues.
Five: Have customers benefitted from competition? Have they seen improvements in WPD's price or service quality or have they been able to source a superior service or better price from WPD's competitors?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	WPDs pricing has always been some of the keenest across the UK and CN customers have benefitted by the work WPD have undertaken in these DSAs. We are finding that some of the non-contestable prices seem to be higher but we believe that this is as a result of the takeover and a realignment of costs rather than anything else.

Question	RMS(S)	DSA(S)	Response
<p>One: Does the level of competitive activity in the RMSs show that there is the potential for further competition to develop?</p>	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	<p>In the two original WPD DSAs competition is still patchy due to the geography and lack of workload to encourage new entrants. In the two Midlands areas we see a lot of competition with a number of new entrants working within these DSAs.</p> <p>As the amount of new connection work increases we are seeing more companies wanting to get involved in these markets.</p>
<p>Two: Consider the organisational structure of WPD's business and its procedures and processes –</p> <p>(a) how do they compare to those you encounter elsewhere in the gas and electricity markets or other industries? Do they reflect best practice?</p> <p>(b) do they enable competitors to compete with the timescales for connection (from quote to energisation) offered by WPD? Or do they offer WPD any inherent advantage over its</p>	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	<p>We have always found the decentralised approach that WPD employ as a very useful way of operating. As the local staff know what is going on we find that they are more receptive to suggestions and different ways of working. We also find that the central core of WPD are always on hand to support their regions and generally take a customer focused approach to deliver the project. Recently we had a particular issue with a project that WPD took a very reasoned approach that allowed our customers to have a connection before the Christmas break despite some of the finer points of the process being completed. We do not believe that all DNOs would have taken the same approach and would hold this up as a pragmatic way of working rather than following the rule book. This is the way that the gas industry operates and a number of DNOs would benefit from following this model.</p> <p>Whilst the overall process for obtaining a quotation through to the initial connection is still too long we do find that WPD will work with us to deliver a project in a reasonable timescale. We still require this to become the normal way of operating rather than the exception but believe that WPD are working hard to achieve this. Our shortest timescale for an HV connection was achieved within a WPD DSA and was</p>

<p>competitors or prevent existing competitors from competing with them effectively?</p> <p>(c) do they assist, obstruct or delay connections providers entering the RMSs?</p>			<p>completed within eight weeks from acceptance. This was achieved with both teams working together and delivering on behalf of the customer.</p> <p>Whilst we have seen some difficult clauses in contracts that we could not agree to, we can always negotiate with WPD to resolve any potential issues. To this end we do not believe that they cause any major issues and are generally helpful to new entrants.</p>
<p>Three: Are the non-contestable charges levied by WPD for statutory connections in the RMSs consistent with those levied for competitive quotations? Are they easily comparable with competitive quotations?</p>	<p>Metered LV <input checked="" type="checkbox"/></p> <p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV+ <input type="checkbox"/></p> <p>DG LV <input type="checkbox"/></p> <p>DG HV/EHV <input type="checkbox"/></p> <p>Unmetered LA <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered Other <input type="checkbox"/></p>	<p>S West <input checked="" type="checkbox"/></p> <p>S Wales <input checked="" type="checkbox"/></p> <p>East Mids <input checked="" type="checkbox"/></p> <p>West Mids <input checked="" type="checkbox"/></p>	<p>We do not see quotes that WPD put into the market for their statutory quotations. Whilst there are still issues around the apportionment element we believe that they are consistent.</p>
<p>Four: What factors are key influences on development of competition in the RMSs? In particular, if you are an existing/potential competitor</p> <p>(a) what is the potential for you to enter new RMSs, or grow your share of an RMS you already operate in?</p>	<p>Metered LV <input checked="" type="checkbox"/></p> <p>Metered HV <input checked="" type="checkbox"/></p> <p>Metered HV/EHV <input checked="" type="checkbox"/></p> <p>Metered EHV+ <input type="checkbox"/></p> <p>DG LV <input type="checkbox"/></p> <p>DG HV/EHV <input type="checkbox"/></p> <p>Unmetered LA <input type="checkbox"/></p> <p>Unmetered PFI <input type="checkbox"/></p> <p>Unmetered Other <input type="checkbox"/></p>	<p>S West <input checked="" type="checkbox"/></p> <p>S Wales <input checked="" type="checkbox"/></p> <p>East Mids <input checked="" type="checkbox"/></p> <p>West Mids <input checked="" type="checkbox"/></p>	<p>GTC have been discussing elements that still need to be resolved with WPD and are looking to engage in more detail during 2013. The main element that we have identified to resolve is the assessment of point of connection and joining this up with the application for self Energisations of the point of connection. This is the area that we believe will transform our ability to deliver the service our customers require.</p> <p>The main issues for GTC are the amount of available work within the various RMS's. Workload in the South West and Wales areas has been effected more by the economic downturn but as this changes we expect more work to</p>

<p>(b) are there are any types of connection in any of the RMSs, or geographic locations in WPD's DSAs, that by their nature, are not attractive to competition? Please explain your response.</p>			<p>appear and we will be looking to grow our share of the market. This is always assisted by the support WPD have provided with the emergency response service.</p> <p>GTC are interested in all types of connection work and will continue to explore these opportunities. One issue that we have identified is the use of linking chambers to connect Low Voltage networks. This is not replicated within the gas market and does make smaller Low Voltage networks untenable for our customers due to the cost of the equipment which is not used by the DNO in its own statutory quotations. We will continue to explore the possibility of removing these so that the markets become more attractive for us and our customers.</p>
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Chapter Four

Question	RMS(S)	DSA(S)	Response
One: Do you agree with the methods used by WPD to analyse the level of competition in each of the RMSs covered by its application? In particular, do you consider that WPD gives a clear indication of the current level of competitive activity?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	WPD's figures appear to reflect our understanding of the DSA's. It is clear that there is far more activity in the two Midlands areas. GTC would recognise the difference in competition between the areas and feel that their assessment is a reasonable assumption of the level of activity.
Two: Do you consider that competitive activity is at a level that in itself indicates that effective competition exists?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	Whilst the level of activity is a good indicator it should also be a factor that the market is ready for activity but the overall opportunity is not available to encourage new competitors to enter or move into these markets. This would be our assessment of the South West and South Wales DSAs.

Chapter Six

Question	RMS(S)	DSA(S)	Response
One: Do you consider customers have an effective choice of connections provider? In particular, do you feel that levels of choice, value and service will be protected and will improve if the restriction on WPD's ability to earn a margin is removed?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	GTC believe that WPD have moved their position over the last two years and we believe that it now has systems in place to assist and support competition. Whilst there are still areas that need to be refined these are not preventing competition, merely slowing it down.
Two: Do you consider that there is scope for competitors to grow their market share (for example, if WPD put up its prices or if its quality dropped), or are there factors constraining this?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	From the points made previously their still needs to be economic recovery within South Wales and South West and more work to be undertaken to streamline the overall process. Once these factors occur there will be more scope for growth in the WPD DSA's.
Three: Do you consider that there is scope/appetite for new participants to enter the market? Do you consider that new entrants would be able to provide similar or better services than existing participants or are there factors constraining this?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	Whilst the DNOs still have overall control of the timescale for delivery then all competitors and customers will be concerned about how far they can improve their service offering. Only when these are truly removed will customers see more competitors being able to offer tailor made solutions for customer groups.
Four: Given your overall view of WPD, do you consider that we can have confidence in them to operate appropriately in the event that price regulation is lifted?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/>	WPD have always worked with GTC to open up markets and look at ways of operating. Whilst, like most DNOs, there is a time lag from agreeing things to delivering them we find that WPD can make changes quickly and in an appropriate manner. Whilst there will always be another issue to resolve we are confident that WPD will find ways of delivering these

	Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	West Mids <input checked="" type="checkbox"/>	as quickly as possible. .
Five: Do you consider that there are factors not addressed in this consultation that should be taken into consideration in determining whether price regulation should be lifted?	Metered LV <input checked="" type="checkbox"/> Metered HV <input checked="" type="checkbox"/> Metered HV/EHV <input checked="" type="checkbox"/> Metered EHV+ <input type="checkbox"/> DG LV <input type="checkbox"/> DG HV/EHV <input type="checkbox"/> Unmetered LA <input type="checkbox"/> Unmetered PFI <input type="checkbox"/> Unmetered Other <input type="checkbox"/>	S West <input checked="" type="checkbox"/> S Wales <input checked="" type="checkbox"/> East Mids <input checked="" type="checkbox"/> West Mids <input checked="" type="checkbox"/>	GTC believe that the fundamental principle should be 'Can an IDNO or ICP operate without timescales being imposed by the DNO?' At the present time this is not possible due to the process that is used by all DNOs. We have discussed the principle of this with WPD and are helping them work towards this overall solution.