

From: Steve Gist [mailto:steve@tusc-ltd.com]

Sent: 13 June 2014 12:54

To: James Veaney

Cc: Connections

Subject: Consultation on the Incentives on Connections Engagement (trial) Part One Submissions - TUSC View on UKPN Submission

Dear James

TUSC Ltd is an independent multi-utility connections consultant. We are usually positioned as the DNO's customer with regards to DG connections. Presently we have as many as 20 major DG connections in various stages of completion across several DNOs licence areas. We attend UKPN Customer Experience Workshop events and operate within all three of their licence areas.

UKPN's 'Targeted Engagement' seems to us to be confused and confusing in that it includes for four forums which overlap and conflict. For example UKPN seems to regard 'Competition in Connections' separately from 'Connections' instead of one being an integral part of the other. This illustrates an ongoing disconnect in UKPN's corporate thought process i.e. in its own words it considers CiC a matter engagement with ICPs and IDNOs with Connections being a matter for separate engagement with developers, house builders and consultants. This is in our view the wrong approach. Everything should revolve around the customer. Thankfully, in reality many of UKPN's personnel are customer focussed, but working within a culture that tries to fit the customer in with the process, rather than the other way around clearly makes day to day work very difficult for them.

There is also the real impression when attending UKPN DG 'Customer Experience Workshops' that they are run in such a way as to convince the stakeholders to agree to what UKPN is proposing. UKPN staff do most of the talking and debate is often terminated. Contrary views are clearly not particularly welcomed – including looks of horror on UKPN personnel's faces when challenged on assertions. An example of the resultant from this is the following statement extracted from UKPN's submission:

'Lead time reduction

We recognise the importance of a timely service to our customers who are often working to tight deadlines. With the significant growth we have seen in the DG market there is increasing need for us to match resources to demand to ensure we deliver quotations or work in a timescale that meets customers' needs. We must ensure we are well placed to respond to the growth in enquiries and able to improve our lead times and will do this by:

Following discussion at our Customer Experience Workshop in February 2014 we will introduce the requirement for 'Letters of Authority' to accompany all DG applications with effect from 1 June 2014. This will provide proof that applications are made on behalf of Landowners and is designed to speed up the application process;

This statement is simply incorrect. The Letters of Authority do not provide proof, they provide an unsubstantiated statement. Secondly it is noted that UKPN have omitted to write down what it told attendees at its Workshop that the 'clock' will not start running on the processing of the applications until such time as a LoA which follows the UKPN guideline is received. In other words, this additional procedure has the potential to *increase* lead in times, not as is suggested reduce them. Indeed the LoA contains a requirement for the 'Landowner' to fill out technical details as well as a simple statement that he/she/it owns the reference property, so our view is that in the form now introduced

it will make matters worse not better. Attempts to engage with UKPN on these points were curtailed at the Workshop referred to and the distinct impression given was that the overriding factor was to meet the deadline for this submission rather than get it right. Wrong way around UKPN!

We have no comments on the more specific areas set out in the OFGEM consultation area in the letter of 2nd May 2014.