

30th July 2014

Our ref: NF/MCCG/OFGEM 0714



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

T: 0845 2300116
M: 07825 379387
E: neil.fitzsimons@poweronconnections.co.uk

Sent by email only.

Dear James

Response to: Competitor Survey Questionnaire Dated 24 June 2014

Dear James,

I am writing on behalf of the Metered Connection Customer Group (MCCG) to set out our group's response to Ofgem's request for information dated 24 June 2014.

MCCG has worked with Ofgem and the Distributors for some considerable time and represents the interest of customers and competitors involved in developing Competition in Connections. We are not representative of any Company or individual and present a collective view.

We have appended an updated copy of our issues register that has been discussed at our most recent meetings. MCCG members are keen to work with Ofgem and DNOs to bring about change and to this end; we are planning a workshop in September this year. At the workshop we hope to share with you and the DNOs the MCCG's vision of how competition in connections should be developed to ensure our members, where they are customers, will receive better service in future and, where they are competitors, will have the opportunity to compete with DNOs' own connections businesses on a level playing field.

We believe that a change in mind-set is required by many of the DNOs where they step back from the process and allow ICPs to get on with providing connections to their customers without interference from the DNO. We also

believe that DNOs are unlikely to come to this realisation without a very clear message from Ofgem that a step change in approach is required. We hope and expect that this request for information is to be the first step taken by Ofgem to change this mind-set. We believe that this call for evidence must be followed up by firm action by Ofgem that will make it clear to the DNOs that the current situation will no longer be tolerated. We believe that all DNOs still have some way to go before their markets could be considered fully open to competition and where competitors can operate independently from the DNO. Progress to this end has been very slow to date and has only moved at any pace as a result of regulatory intervention. We believe the time has come for further regulatory intervention that will ensure that the DNOs bring about immediate changes to bring about positive change.

Should you to discuss any aspect of our response please don't hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N Fitzsimons', with a stylized flourish at the end.

Neil Fitzsimons
On behalf of the MCCG

APPENDIX MCCG ISSUES REGISTER

Item	Description	DNO areas where this item causes most concern
1	Availability of G81 information - online and current	SSE
2	Easy Access to DNO network records	UKPN
3	Easy Access to DNO network data (including details of committed load) for the purpose of A and D (Self Determination)	All DNOs
4	DNO inspection and monitoring, policy and practices - I and M must be proportionate and similar to audit regimes of the DNO's internal staff and contractors	NPG
5	Design Approval Process - ICP to control via a self certification of the design similar to GIRs in gas industry where the design is approved by the ICP's Designated Designer. DNO only validates that the relevant information is available as an ADMIN exercise	UKPN, SP
6	DNO must be flexible to enable the ICP to construct the Minimum Cost Scheme (e.g. Some DNOs insist that ICPs always install largest size cable in all the circumstances)	NPG and ENW both insist on larger than necessary cable sizes, UKPN and SPM require additional switchgear and automation. The incremental costs incurred by these additional features should be funded by DNOs rather than new connecting customers
7	Terms in adoptions agreements including the types of agreements available	UKPN
8	Non SLC 15 Service Timescales (e.g. NTRs and reinforcement works)	All DNOs
9	Customer Engagement	SP
10	Self Connect Connection Activities LV	The process should be the same as when their own subcontractors self connect. Easy access to network records

		is a barrier. WPD are closest to this goal than the other DNOs.
11	Self Connect Operations Activities LV	No DNO allows operational activity for LV Self Connect.
12	Self Connect Connection Activities HV	The process should be the same as when their own subcontractors self connect. Easy access to network records is a barrier. WPD and ENW are closest to this goal than the other DNOs.
13	Self Connect Operations Activities HV	The process should be the same as when their own subcontractors self connect. ENW are closest to this goal than the other DNOs.
14	Timely Dispute Resolution Process	SP, UKPN and NPG
15	ICP to be in control of delivery of the connection	All DNOs
16	Slick applications processes similar to DNO's service to it own connections business	All DNOs
17	Contestability of Disconnections on Brown Field Sites	All DNOs
18	Behaviour of Upstream Operator doesn't cause loss of work	All DNOs
19	Self Determination of Assessment and Design	All DNOs, trials in place so far have scopes that are too narrow to be attractive enough for ICPs to get involved
20	Letters of Authority to make connection requests	SSE
21	Land rights process guaranteed standards of performance	All DNOs