

Sam Cope  
Distribution Policy  
Ofgem  
9 Millbank  
London  
SW1P 3GE

17<sup>th</sup> March 2015

Dear Sam

**Re – Consultation on Ofgem’s Proposed Remedies following The Findings of the Review of the Electricity Connections Market**

We write in response to the current consultation on Ofgem’s proposed remedies to the Electricity Connections Market due to finish on 18<sup>th</sup> March 2015 – which we welcome as an important step forward in achieving transparent and fair competition. Our comments are as follows:

**Question 1: Please provide your comments on the proposed structure and content of the CoP licence condition.** We agree with the proposal to create a licence condition for compliance with the proposed CoP and that this should take effect no later than September 2015.

**Question 2: Please provide your comments on the minimum requirements we have proposed for inclusion in the CoP.** Regarding the minimum requirements, we are in agreement with all of these and stress the need for publicised and transparent requirements within and across all DNOs in respect of these. We have one specific comment in addition regarding Accreditation. We are concerned about the wording of the first bullet point which allows a judgement to be made in respect of “unnecessary requirements”. Most DNOs have justified retaining barriers to competition through multiple accreditations by using the fact that they have particular “Distribution Safety Rules”. We do not believe that this is a reasonable position. The Lloyds accreditation scheme is in place and this could be used as the standard for UK wide recognition providing the Lloyds Scheme governance is changed such that they are responsible to customers / ICPs and not solely to DNOs. We suggest the first bullet point is re-worded as:

- “DNOs must allow for a common ~~or and~~ fully transferable accreditation and authorisation for work on their networks. Once an individual has been certified as competent on one DNO’s network, they should not have to face any unnecessary requirement to be accredited again elsewhere. Such accreditation and authorisation should not be unduly onerous when compared to other DNOs requirements.”

**Question 3: In addition to the minimum requirements, what else should be included in the CoP?** We believe that all requirements of the CoP should be transparent within and across DNOs and publicised by all DNOs such that these are easily accessible by customers and ICPs – both current and potential. In particular where DNOs have alleged “special situations” such as the so-called solid interconnected networks – that information on these should be readily available to and by all interested parties to enable such parties to accurately identify that these “special situations” exist or not at the proposed PoC or other relevant works being carried out. All DNOs should give access to ICPs and other interested parties to up to date drawings (this may be covered by the second bullet point under PoC).

The Design Approvals section needs further amplification to ensure that the mechanism by which designers are approved is transparent, publicised and equitable and that for simple works (such as single connections of lighting columns) that “design approvals” – if required at all in these instances - can be set at a suitably simple level without onerous fees for such approvals.

It is essential that the Accreditation section is expanded to include G39/2 – or that a section is added as a separate requirement. In line with the requirements set out in the proposed CoP for Accreditation, DNOs

must allow for a common and fully transferable training and authorisation for work covered under ENA engineering recommendation G39/2 (or latest issue thereof). Once an individual has been trained and authorised on one DNO's network, they should not have to face any requirement to be trained and authorised again elsewhere. G39/2 already includes reference to G39/2 training delivered under the Highway Electrical Registration Scheme (HERS) – and DNOs should not be allowed to maintain barriers to competition by insisting on their own authorisation (often accompanied by – or issued as part of - training offered by the DNO, which has been adopted as a line of least resistance by some customers or contractors when wishing to gain such authorisation). Despite Ofgem ruling on this area in the past, it has repeatedly surfaced as an issue over the last fifteen years.

DNOs should be required to ensure that competition in other areas – such as overhead lines and emergency responses to, for example, highway electrical equipment, are explored and facilitated.

Finally DNOs should be required to ensure that information on compliance with the CoP and any relevant additional information is publicised to customers and ICPs and put into the public domain. This should include the detail of the requirements – e.g. for accreditation. Some DNOs have used the excuse of having to report performance to Ofgem as a reason not to report this to customers.

Regarding the timetable for the CoP itself – we would expect to see a period for public consultation prior to finalisation and we hope that this can be accommodated explicitly within the Milestone table. We hope that the foregoing is clear and helpful and look forward to contributing further to the detail within the proposed CoP.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gareth Pritchard', written in a cursive style.

Gareth Pritchard BTech (Hons) CEng FILP MIET TechIOSH  
Secretary UCCG  
Chief Executive HEA – Highway Electrical Association