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By email only to QoS@ofgem.gov.uk

Dear Paul

Statutory consultation on our proposals to revise existing standards of performance for relevant electricity operators

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. Our response is not confidential and can be published via the Ofgem website.

Our detailed feedback can be found in the appendix to this letter, however if you have any queries please do not hesitate to contact me or Paul Measday (paul.measday@ukpowernetworks.co.uk).

Yours sincerely



Keith Hutton
Head of Regulation
UK Power Networks

Copy Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks
Karl Hurley, Ofgem

Appendix

The Electricity (Standards of Performance) Regulations

1. The proposed definition of “Priority Services Register Customer” leaves a small risk for distributors whereby the customer (someone acting on their behalf or a Relevant Supplier) has requested that the customer be added to the Priority Services Register but before the distributor can action their request, the customer is subject to a qualifying standard. We believe that a minor change to the wording would alleviate this risk and still provide the required outcome:

“Priority Services Register”, means a list established and maintained by an electricity distributor which contains the details of Priority Services Register Customers;

“Priority Services Register Customer”, means a domestic customer who:

- a) is of pensionable age, disabled, or chronically sick, and
- b) because he has special communication needs or is dependent on electricity for medical reasons, requires certain information and advice about interruptions in the supply of electricity to its premises; and
- c) **whose name appears on the Priority Services Register for one of the following reasons has either:**
 - (i) **they have** personally asked the licensee to add **his** **their** name to the Priority Services Register, or
 - (ii) **they have** had a person acting on **their** **his** behalf ask for his name to be added to it, or
 - (iii) **they have** had a Relevant Supplier ask for **their** **his** name to be added to it.

2. Regulation 12 (distributor’s fuse) now allows for notification to be made by email or text message as well as by telephone. Although we understand that as technology progresses, notifications are not always made by telephone; the current drafting provides no clarity that the notification must be to a **specified** email address or text number. We believe that clarity on this point is vital for the successful implementation of this change. It is also an opportune time for inclusion of other technologies (such as those that are internet based) so that the Regulations cater for notifications under Regulation 12 by such means.
3. Redundant regulations – we support the inclusion of “Redundant” regulations so as to avoid the renumbering of regulations that are remaining. Such a renumbering would have had led to users being confused and to consequential cost impacts on systems to update them. Note that “Not used” would be a suitable text to be added against such regulations.
4. Pagination – the track changes for the statutory instrument have led to some significant pagination issues which have made the draft amendments harder to follow. We assume Ofgem will rectify this as part of the finalisation process for the statutory instrument.

The Electricity (Connections Standards of Performance) Regulations

1. We have no specific points to make