

The Office of Gas and Electricity Markets  
9 Millbank  
London  
SW1P 3GE



14<sup>th</sup> September 2017

Dear Sirs,

### **Consultation regarding penalties for DNOs under the Incentive on Connections Engagement**

Further to your request for views on your consultation document, I write to detail my comments and feedback in relation to the various points made.

My observations are based predominately on my dealings with UKPN across their three licenced areas in my guise as Director of Connections and Energy Storage at Anesco and more recently as founder of infrastructure consultancy, Infra<sup>3</sup> Limited. The majority of my contact with UKPN has been through their HV and EHV metered distribution teams with some support from the 11kV metered supply team.

It is my opinion that UKPN have significantly improved their customer engagement over the last few years. I have enjoyed excellent support from all levels of their management team and now have the impression that high levels of customer support is now one of their key goals.

I have not been able to attend every one of their customer forums (both connections and distributed generation) but those that I have I've found to be well organised with all levels of the business represented. At one such event I wondered who was back in the office running the company, such was their representation at the event.

The events have discussed relevant content in both large presentation style but also, and more importantly, small discussion groups where greater detail can be considered. I've found the attitude of those UKPN staff in attendance to be open and honest, keen to listen and feedback.

I was surprised to read the comments reported from other customers in your consultation document as I do not recognise the same attitudes and standards in my own dealings with the company. I can only assume that these have been one off issues from a small number of respondents.

UKPN do not get it right all the time. But compared to other DNO's, I have found their escalation channels to be available and effective. It should be said that the customer isn't always right either but UKPN have always tried their best to support the end goal.

When considering my own experience of working with UKPN, I find your proposed penalty in relation to the ICE programme to be unfair and unjust. I know I share the view of other stakeholders that the size of penalty being proposed is not aligned to what is happening on the ground.

With regard to your specific questions, where able I make the following comments:

**Q1** – We have experienced early communication and feedback in relation to our connection applications. The online heat maps provide guidance to potential problem areas and together with the freely available surgeries and regular contact with local design engineers the application process has become more streamlined, efficient and helpful to the end user.

**Q15** – Once our applications have been submitted, we have always been quickly introduced to the project manager or design engineer who is handling the file. In all cases, this person has remained the point of contact and has always responded promptly to any questions or issues which we may highlight. I can think of only one occasion (out of dozens of projects) where we have had to escalate an issue above a design engineer – the response was positive and a sensible outcome agreed.

**Q16** – Though the various levels of customer engagement already highlighted, I would suggest that the timeframe for the return of offers from initial application has fallen significantly during the last 18 months. Too often in the industry, offers are sent 24 hours before the statutory response deadline. Whilst this may have been the case with UKPN in the past, I no longer find this to be the case.

I trust that this letter provides valuable feedback to the consultation process and I hope will go some way to mitigating the penalty being considered.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'NEIL HUTCHINGS', with a large, stylized flourish extending from the bottom.

NEIL HUTCHINGS  
Director